



PRIVACY NOTICE

WHO WE ARE

Marden Enterprises Limited is a company which is owned and operated by Woldingham School for the purpose of managing the letting and hiring of the school facilities for external events and weddings.

Marden Enterprises Limited uses Woldingham School staff, policies, procedures and resources to carry out its business.

Marden Enterprises Limited is a Private Limited Company registered in the UK as company number 02873104 with a registered office at:

Marden Park
Woldingham
Surrey
CR3 7YA

For the purposes of the relevant legislation ("Data Protection Law"), Marden Enterprises is the data controller and is represented by the Director of Events of Woldingham School.

WHAT THIS NOTICE IS FOR

This notice is intended to provide information about how the Marden Enterprises Limited will use (or "process") personal data about individuals including: its clients, enquirers and contractors.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Clients, potential clients and contractors are all encouraged to read this Privacy Notice and understand Marden Enterprises Limited obligations to its entire community.

General Data Protection Regulation and the Data Protection Act

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act (DPA) and place an emphasis on making privacy notices understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case. Marden Enterprises interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how Marden Enterprises Limited processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. This privacy notice deals with the responsibilities of Marden Enterprises Limited in detail.

This Privacy Notice applies alongside any other information Marden Enterprises Limited may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to Marden Enterprises Limited other relevant terms and conditions and policies, including:

- any contract between Marden Enterprises Limited and a client;
- any contract between Marden Enterprises Limited and a service provider (e.g. the regular catering contractor - Sodexo);
- Woldingham School (as the owner of Marden Enterprises Limited) policies and procedures, including those that cover safeguarding, Health & Safety, Data Protection and data storage;

Anyone who works for, or acts on behalf of, Marden Enterprises Limited (including Woldingham School staff, Sodexo staff and service providers) should also be aware of and comply with this Privacy Notice.

RESPONSIBILITY FOR DATA PROTECTION

The overall responsibility for Data Protection is the Director of Events as the representative of the data controller.

For day to day Data Protection matters Marden Enterprises Limited has appointed Woldingham School's Privacy Officer who will deal with all your requests, including formal Subject Access Requests, enquiries concerning Marden Enterprises Limited uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this notice and Data Protection Law.

Contact details for Data Protection are:

Privacy Officer (Marden Enterprises Limited)
c/o Woldingham School
Marden Park
Woldingham
Surrey
CR3 7YA
E: privacy@woldinghamschool.co.uk

WHY MARDEN ENTERPRISES LIMITED NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties providing a venue hire and wedding venue service.

Some of this activity Marden Enterprises Limited will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its clients and those to maintain licenses to operate (e.g. Civil Wedding Ceremonies).

Other uses of personal data will be made in accordance with Marden Enterprises Limited legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

Marden Enterprises Limited expects that the following uses will fall within its (or its client's) category of either "**contractual/legal**" or "**legitimate interests**" basis for lawful processing:

- To respond to initial enquiries and follow-up correspondence;
- To manage dietary requirements when arranging catering;
- For the completion of wedding registers for Chapel weddings;
- To collect payment for services provided;
- To maintain relationships with current and previous clients, including sending greeting cards, direct marketing and opportunities for regular bookings;
- To ensure all services are provided by suitability qualified and checked personnel accordingly to any relevant guidelines (e.g. Charity Commission guidance on safeguarding and safe use of facilities);
- To monitor (as appropriate) use of any IT and communications systems included in the service provided in accordance with Woldingham Schools acceptable use policies;
- For security purposes, including CCTV and Automatic Number Plate Recognition [ANPR] in accordance with Woldingham School's CCTV policy;
- To prevent fraud or to report potential crimes;
- To carry out or cooperate with any complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for Woldingham School's purposes, including to obtain appropriate professional advice and insurance for the facilities.

In addition, Marden Enterprises Limited will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To ensure the welfare (and where necessary, medical care), and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or service providers who need to be made aware of dietary or medical needs;
- In connection with employment of its staff and contractors / service providers, to perform DBS checks where required by working with vulnerable children and/or adults;
- As part of any complaints, disciplinary or investigation process that involves such data, for example if there are health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY MARDEN ENTERPRISES

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to the school;
- dietary requirements (collected on behalf of the catering contractor);

- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- professional memberships, qualifications, DBS clearance and references given or relevant information provided by service providers; and
- correspondence with and concerning past and future events and weddings

HOW MARDEN ENTERPRISES COLLECTS DATA

Generally, Marden Enterprises Limited receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data will be supplied by third parties (for example a family member, or other professionals or authorities working with that individual). Marden Enterprises Limited will carry out reasonable checks to establish the authority of third parties to supply any personal data.

WHO HAS ACCESS TO PERSONAL DATA AND WHO MARDEN ENTERPRISES LIMITED SHARES IT WITH

As Marden Enterprises Limited is owned and staffed by Woldingham School all data collected will be handled and processed by Woldingham School staff acting on behalf of Marden Enterprises Limited.

Occasionally, Marden Enterprises Limited will need to share personal information relating to its clients with third parties, such as:

- professional advisers (e.g. lawyers, insurers, and accountants);
- government authorities (e.g. Government Registry Offices relating to Chapel Weddings);
- appropriate regulatory bodies (e.g. the [Charity Commission](#) or the [Information Commissioner](#)); and
- service providers (e.g. catering companies, travel companies and transport companies); and

For the most part, personal data collected by Marden Enterprises Limited will remain within the organisation (including Woldingham School), and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- financial information [is not retained following successful payment, normally taken from individual on phone end entered straight into terminal and not recorded]; and
- dietary requirements [collected on a form provided and managed by the catering contractor and passed straight to contractor with no copy held];

All Internet usage from the WiFi network available across the facilities is via a system called iBoss to provide automated filtering of unsuitable and illegal content according to the Woldingham School ICT Acceptable Use, Safeguarding and Child Protection policies.

Finally, in accordance with Data Protection Law, some of Marden Enterprises Limited processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with Marden Enterprises Limited specific directions.

HOW LONG WE KEEP PERSONAL DATA

Marden Enterprises will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep data relating to a contract for service is up to 7 years following the service being provided. However, incident reports, complaints and any safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact our Privacy Officer (privacy@woldinghamschool.co.uk). However, please bear in mind that Marden Enterprises Limited will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

KEEPING IN TOUCH

Marden Enterprises will use the contact details of clients to keep them updated about events of interest, including by sending updates by email and by post, manage regular bookings and to send greeting cards as appropriate.

- Should you wish to limit or object to any such use, or would like further information about them, please contact the Privacy Officer (privacy@woldinghamschool.co.uk) via email or in writing to Privacy Officer (Marden Enterprises Limited), Woldingham School, Marden Park, Woldingham, Surrey CR3 7YA.
- You always have the right to withdraw consent, where given, or otherwise object to direct marketing. However, Marden Enterprises Limited is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

- [Rights of access, etc.](#)

Individuals have various rights under Data Protection Law to access and understand personal data about them held by Marden Enterprises Limited, and in some cases ask for it to be erased or amended or have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Privacy Officer (privacy@woldinghamschool.co.uk) via email or in writing to Privacy Officer (Marden Enterprises Limited), Woldingham School, Marden Park, Woldingham, Surrey CR3 7YA.

Marden Enterprises Limited will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

Marden Enterprises Limited will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, Marden Enterprises Limited may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by Marden Enterprises Limited, or documents prepared in connection with a legal action).

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Consent

Where Marden Enterprises Limited is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are: keeping in touch via marketing communication. Please be aware however that Marden Enterprises Limited may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. contract or agreement for services).

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates.

DATA ACCURACY AND SECURITY

Marden Enterprises Limited will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify Marden Enterprises Limited of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why Marden Enterprises Limited may need to process your data, of who you may contact if you disagree.

Marden Enterprises Limited will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to systems. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS NOTICE

Marden Enterprises Limited will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Privacy Officer using the following contact details:

Privacy Officer (Marden Enterprises Limited)
Woldingham School
Marden Park
Woldingham
Surrey
CR3 7YA
Or via email privacy@woldinghamschool.co.uk

If an individual believes that Marden Enterprises Limited has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the Privacy Officer (details above). You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with Marden Enterprises Limited before involving the regulator.

Marden Enterprises Limited Privacy Notice
Updated: 3 May 2018