



Privacy Notice No:	61
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Service Area:	Communities Services
Work Area:	Catering Services
Contact Details:	01443 864055 www.catering@caerphilly.gov.uk
Privacy Notice Name:	Cashless Catering Secondary School Meals
Description of Privacy Notice:	This notice is for pupils / parents / guardians who use the cashless catering systems in secondary schools and explains why we use your personal information and what we use it for.

How we will use your information

Source and type of information being processed

Purpose and legal basis for using your information

Purpose of processing

Caerphilly County Borough Council's Catering Services will process personal data to provide a cashless catering service on behalf of Schools, using cashless cards and biometric recognition systems i.e. fingerprints, allowing a mixture of cards and biometrics to be used to pay for food and drink items in the school canteen.

Legal basis for processing

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

In accordance with advice provided by the Department of Education, we are relying on Article 6 (1)(a) to process your personal data i.e. the data subject has given consent to the processing of his or her personal data for one or more specific purposes

Data Protection legislation provides extra protection for certain classes of information called "special category personal data" and as biometric data falls under this category, an additional condition from Article 9 of the Regulations is required as outlined below:

9 (2)(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

The right to withdraw consent

You have the right to withdraw your consent to the processing of this information. To withdraw your consent, please contact the Service Area whose details are contained at the top of this document.

Who will have access to your information

Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Caerphilly County Borough Council.

The Data Protection Officer is:

Ms Joanne Jones
Corporate Information Governance Manager / Data Protection Officer
Email: dataprotection@caerphilly.gov.uk
Tel: 01443 864322

Other Data Controllers may also be responsible for your information, depending on the specific circumstances. Please contact the Service Area for further information.

Details of main users of your information

Caerphilly County Borough Council – Catering Services and Information Technology Services.

Uniware Systems Limited – software provider

School

Details of any sharing of your information within Caerphilly county borough council

Any queries in relation to the processing of biometrics data may be shared with other departments within the council e.g. IT for any system problems

Details of any sharing of your information with other organisations

Uniware Systems will resolve or assist Caerphilly County Borough Council in answering queries or system problems.

Details of any external data processors

Uniware Systems Limited,
84/85 Riverside III
Sir Thomas Longley Road,
Rochester
Kent
ME2 4BH

Details of transfers to any countries outside of the European Economic Area

There are no transfers to any countries outside of the EEA.

Requests for information

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and the Data Protection Act 1998.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

How long will we retain your information?

Details of retention period

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

Cashless catering records and biometric data is deleted once a pupil leaves the school or when the pupil or their parent/guardian withdraws consent.

We may need to retain some records to comply with other applicable legislation e.g. finance, taxation, fraud and money laundering law requires certain records to be retained for an extended duration, in some cases for up to seven years.

Your Rights (Inc Complaints Procedure)

Your rights under Data Protection

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: www.ico.org.uk.

To enact your rights please contact the service area detailed on the top of this form.

Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints