



## THE MOUNTBATTEN SCHOOL

### Privacy Notice for Biometric Data

The Mountbatten School is the 'Data Controller' for the personal information we process. We are committed to protecting the privacy of our students and workforce in accordance with the UK GDPR and the Data Protection Act 2018

Our data protection officer can be contacted via [dpo@mountbatten.school](mailto:dpo@mountbatten.school)

### The Personal Data we hold

We process Biometric Data, which is information about physical or behavioural characteristics that can be used for identification. For our Biometric Recognition System, this specifically includes:

- Fingerprint templates (mathematical representations of fingerprint patterns, rather than actual images of fingerprints).

### Why we use this Data

The school uses a biometric recognition system for the following purpose:

- Payment of dinner monies via our cashless catering system

### The lawful basis for Processing

Biometric data is classified as Special Category Data and requires a higher level of protection. We process this data under:

- Article 6(1)(a) (Consent): We only process biometric data where we have obtained explicit written consent.
- Article 9(2)(g) (Substantial Public Interest): Necessary for reasons of substantial public interest.
- Protection of Freedoms Act 2012: We comply with the additional legal requirements for obtaining and managing biometric consent in schools

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

### Storage and Security

Biometric templates are stored on school-approved, secured platforms.

Whitenap Lane Romsey Hampshire SO51 5SY  
t: 01794 502 502 e: [info@mountbatten.school](mailto:info@mountbatten.school)  
w: [www.mountbatten.school](http://www.mountbatten.school) Company No. 07560175

- Technical Security: We use encryption for data at rest and in transit.
- Access Control: Access is restricted to authorised personnel on a "need-to-know" basis only.
- Biometric Data is not inputted into any Artificial Intelligence

Data is not transferred outside of the UK/EEA.

The school does not currently use automated decision-making or profiling within its biometric recognition system.

## Data Retention

In accordance with our Data Retention Policy, we only keep personal data for the minimum period necessary. Biometric data is typically retained:

- Until consent is withdrawn; or
- Until the student or staff member leaves the school, at which point the template is securely deleted from the system

## Your Rights:

Individuals have a right to make a 'subject access request' (SAR) to gain access to personal information that the school holds about them. If you make a subject access request, and if we do hold information about you, we will respond to requests for access to personal data, including biometric templates within one calendar month. This may be extended by a further two months for complex cases, in which case you will be notified within the first month.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

## Your other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing.
- Claim compensation for damages caused by a breach of the data protection regulations

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**Right to Rectification:** If you identify inaccurate data, we will respond to your request for correction within one month. This may be extended by a further two months for complex cases, in which case you will be notified within the first month.

**Rights to Restrict Processing:** you have the right to suppress the processing of your personal data. This allows the school to continue holding the data but prevents any further use of it while we consider requests for rectification or objections to processing.

**Rights to Withdraw:** Processing is entirely optional, and we must obtain written consent before any data is recorded:

- For Students: we notify each parent and must obtain the written consent of at least one parent before obtaining any biometric data.
- For Staff: Written consent is obtained at the start of employment.

**Withdrawal:** You may withdraw your consent at any time in writing to the DPO via [dpo@mountbatten.school](mailto:dpo@mountbatten.school). If an individual objects or refuses to participate, the school will not process their data.

### **Alternative Provisions**

If consent is not provided or is withdrawn, the school will provide an alternative means for accessing the catering services, such as:

- Asking for the student's name at point of sale
- A payment card.

For requests regarding non-personal school information, please refer to our Freedom of Information Policy.

## **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113

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- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact

If you would like to discuss anything in this privacy notice, please email for the attention of the Data Protection Officer via [dpo@mountbatten.school](mailto:dpo@mountbatten.school)

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