

Responsible for Initiating Review of Policy	SLT
Committee to Review	SLT
Last Review Date	May 2018
Review Period	Annually
Approved by (Committee and Date)	SLT May 2018
Approved by Board of Governors	
Effective Date of Policy	May 2018
Next Review Date	May 2019
Related Policies	Cookie Policy



## Introduction

This privacy notice gives you information on how we collect and process personal data about you, whether through your use of our website (including signing up to newsletters), by direct interactions with you, or generally by doing business with you (including where we collect personal information with a view to doing business with you in the future).

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

# Who is responsible for your personal data?

Burgess Hill School for Girls is a "data controller" and this means that we are responsible for deciding how we hold and use your personal data. Our contact details are at the end of this notice.

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO, Graham Bond. Details of our DPO can be found at the end of this policy.

# What does that law say about how we use personal data?

The law requires that personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

## What data do we hold about you?

We collect, hold and process a range of personal data about parents, governors and those we contract with, including:

Parents or prospective parents: name and contact details, bank details

**Governors**: name and contact details; criminal convictions disclosure checks

Alumni: name, age and contact details of past students

Suppliers and contractors: contact details of named contact

#### How is your personal data collected?

We use different methods to collect data from and about you, including through:

- Direct interactions by filling in forms or by corresponding with us by post, phone, email or otherwise;
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. [We may also receive Technical Data about you if you visit other websites employing our cookies.] Please see our <u>cookie policy</u> for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties [and public sources] as set out below:
  - (a) Technical Data from the following parties:
    - (i) analytics providers [such as Google based outside the EU];
    - (ii) advertising networks based [inside OR outside] the EU]; and
    - (ii) search information providers based [inside OR outside] the EU].
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based [inside OR outside] the EU].

- Identity and Contact Data from data brokers or aggregators based [inside OR outside] the EU].
- Identity and Contact Data from publicly availably sources [such as Companies House and the Electoral Register based inside the EU].

# How your personal data is used

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where it is necessary:

- to enter into a contract with you; or
- to comply with a legal obligation; or
- for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

# Our website

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

# Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

# Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased [goods or services] from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing.

# Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Burgess Hill School for Girls Company group of companies for marketing purposes.

# Opting out

You can ask us or third parties to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or] by Contacting us at any time].

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a product/service purchase, warranty registration, product/service experience or other transactions].

# Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <u>cookie policy</u>.

# Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### Information about criminal convictions

We may occasionally use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about employees or former employees in the course of legitimate business activities with the appropriate safeguards. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

#### How do we share your data?

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

We will not transfer your personal date outside the EU. If we do, you can expect a similar degree of protection in respect of your personal data.

#### How long will you use my information for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods are contained in our retention policy which is available on request.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

#### What are your responsibilities?

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

## What are your rights?

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. We may charge a reasonable fee if your request for access is clearly unfounded or excessive, alternatively we may refuse to comply with the request in such circumstances.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below). We will not be required to delete or remove personal data if your objection is not upheld.
- Object to processing of your personal data where we are relying on a legitimate interest as the reason for processing (as identified in the Appendix) and there is something about your particular situation which makes you want to object to processing on this ground. We are not obliged to uphold your objection where the legitimate interest relied on outweighs the reason for your objection.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it or while we are considering your objection to processing.
- Request the transfer of your personal data to another party.
- If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our data protection contact in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact our DPO or data protection contact. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### **Data security**

We have put in place measures to protect the security of your information and procedures to deal with any suspected data security breach. Details of these measures are available upon request. We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

#### Complaints

If you have any questions about this privacy notice or how we handle your personal data, please contact our data protection contact. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

By email:	Please complete the form at <u>https://ico.org.uk/global/contact-us/email/</u>
By phone:	0303 123 1113
By post:	Information Commissioner's
	Office
	Wycliffe House
	Water Lane
	Wilmslow
	Cheshire
	SK9 5AF

#### Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

#### Our details

Company Name:	Burgess Hill School for Girls Company
Registered	Keymer Road
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Address:	Burgess Hill
	West Sussex
	RH15 0EG
Company	00289787
Number:	
Telephone:	01444 241050
Email:	Graham.bond@burgesshillgirls.com
Name of	Graham Bond
DPO:	
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