

# **PRIVACY POLICY**

The Purcell School (we) are committed to protecting and respecting your privacy.

This policy, together with our terms of use (click <u>here</u>) and any other documents referred to in either document, sets out the basis on which we process any personal data that we collect from you, or that you provide to us, through your use of this website. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By visiting this website, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 and all other related or replacement legislation (**Act**), the data controller is The Purcell School, a company limited by guarantee and not having a share capital registered in England and Wales under company number 00759327, with its registered office at Aldenham Road Bushey, Watford, Hertfordshire, WD23 2TS. We are also a registered charity, registered with the Charity Commission for England and Wales under charity number 312855.

We are a registered data controller with the Information Commissioner's Office under number Z5512451.

Our nominated representative for the purpose of the Act is The Bursar.

#### 1. Information we collect from you

We will collect and process the following categories of data about you:

• Information you give us. This is information about you that you give us by filling in forms on the website (Site) or by corresponding with us by phone, e-mail or otherwise. It also includes information you provide when you report a problem with our site.

The information you can give us in connection with the Site will include your name, address, e-mail address and phone number as well as the name and date of birth of your child(ren).

• Information we collect about you. This is information that we collect automatically about your visit during your time on the Site. It typically involves technical information and is often collected using small data files called "cookies". This information helps us to provide you with a good experience when you browse the Site and also to indicate where the Site requires improvement.

More information on how cookies work, what cookies we use and why can be found in our Cookie Policy (available <u>here</u>).

• This Site does not collect or receive any information about you from third parties.

#### 2. Uses made of the information

All information about you that we collect or receive, whether of a personal or technical nature, through your use of the Site may be used by us in the following ways:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information that you request from us;
- To notify you about changes to our services;

- To administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve the Site to ensure that content is presented in the most effective manner for you and for your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep the Site safe and secure; and
- To comply with our record keeping and information storage obligations and our data protection policy (available <u>here</u>).

# Where you are a pupil, or a parent of a pupil, at the school, the collection and use of your data will be subject to the school's data protection policy, which is available to read <u>here</u>.

### 3. Disclosure of your information

You agree that we have the right to share information collected through your use of this Site with:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of the Site.

We will disclose the information collected through your use of this Site to third parties in the following circumstances:

- In the event that we sell or buy any business or assets, in which case we will disclose your anonymised personal data to the prospective seller or buyer of such business or assets;
- If we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or
- To protect our rights, property or safety, or those of our pupils and their parents, or others.

Please note that the SIMS Learning Gateway, accessible through the Site, is operated by Capita Children's Services, a trading name of Capita Business Services Limited (a company incorporated in England and Wales with company number 02299747 and registered at 71 Victoria Street, Westminster, London, SW1H 0XA) (**Capita**) and subject to a different privacy policy. You are advised to read Capita's privacy policy <u>here</u> before submitting any data to the SIMS Learning Gateway.

No disclosure or transfer of your information will be to persons or entities outside of the European Economic Area (**EEA**) without your prior consent.

#### 4. Where we store your personal data

All information that you provide to us is stored on our, or our selected business partners', secure servers within the EEA, for a period of 12 months after your last contact with us (whether or not as a parent, pupil, alumnus or prospective parent or pupil), and we will take reasonable steps to protect your information in accordance with this policy including (without limitation):

- Installing a secure firewall;
- Using anti-virus protection software;

- Encrypting data; and
- Carrying out regular back-ups.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 5. Your rights

You have the following rights under law in respect of your personal information:

- The right to be informed about the collection and use of your personal information;
- The right of access to your information to verify the legality of our use of it;
- The right to request that inaccurate or incomplete information about you is rectified;
- The right to request the deletion or removal of your information where there is no further reason for us to use it (such as you have withdrawn your consent);
- The right to restrict the use of your information;
- The right to obtain and reuse the information that we have about you for your own purposes;
- The right to object to certain uses (such as for marketing purposes); and
- The right not to be subject to a decision that has a legal effect on you that has been based on an automated decision.

Should you wish to exercise any of these rights, you may do so at any time by writing to us at the address given below. In some cases, we may be permitted to charge a small fee of no more than £10 in respect of our administrative costs.

If you feel that your rights have been breached in any way, you should contact the PR and Communications Department at the address given below, or lodge an official complaint with the Information Commissioner's Office.

### 6. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

### 7. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to The Bursar at Aldenham Road Bushey, Watford, Hertfordshire, WD23 2TS.