

AYSGARTH SCHOOL TRUST LIMITED ("AYSGARTH SCHOOL")

WEBSITE PRIVACY NOTICE ("NOTICE")

SUMMARY OF THE NOTICE

- A. The Notice on the next page applies to all persons who use our website.
- B. We are committed to ensuring that any personal information that we receive or collect about you is used fairly and lawfully by us, is safeguarded by us, and is only processed by us in accordance with relevant data protection law.
- C. The purpose of the Notice is to ensure that we are transparent and upfront with you about what personal information we hold about you and what we do with that information.
- D. The Notice on the following pages therefore covers the following questions:
 - 1. Who does this Notice apply to? (Page 2)
 - 2. What is the purpose of this Notice? (Page 2)
 - 3. What personal data may we collect about you? (Pages 2 and 3)
 - 4. How is your personal data collected? (Page 3)
 - 5. How do we use and share your personal data? (Pages 3 to 5)
 - 6. How can you manage cookies? (Page 5)
 - 7. When might we share your personal data with third parties? (Pages 5 and 6)
 - 8. How long will we keep your personal data? (Page 6)
 - 9. Do we send your personal data outside the European Economic Area ("EEA")? (Page 6)
 - 10. How secure is the personal data that we collect about you? (Pages 6 and 7)
 - 11. What are your rights in relation to your personal data? (Page 7)
 - 12. What other information should you be aware of? (Page 8)
 - 13. When and how can we make changes to this Notice? (Page 8)
 - 14. How can you get in contact with us? (Page 8)
- E. If you have any questions about the Notice then please contact the School Bursar.

1. WHO DOES THIS NOTICE APPLY TO?

1.1 This Notice applies to you, as a user of our website.

1.2 In this Notice references to:

1.2.1 **we, us or our** means **Aysgarth School Trust Limited** (charity number 529538) with its registered address at Aysgarth School, Newton-le-Willows, Bedale, North Yorkshire, DL8 1TF;

1.2.2 **personal data** is data that is about you and which identifies you; and

1.2.3 **processing** (and **processed** and **process**) includes collecting, recording, altering, retrieving, storing, using, disclosing or destroying.

2. WHAT IS THE PURPOSE OF THIS NOTICE?

2.1 We are committed to ensuring that your privacy is protected and that we comply with all applicable data protection laws (including the General Data Protection Regulation, which is otherwise known as "the GDPR") as controller of your personal information and when processing your personal information.

2.2 The purpose of this Notice is therefore to explain, for example:

2.2.1 **what** personal data we collect about you;

2.2.2 how we will **use** and **share** your personal data;

2.2.3 how long we will **keep** your personal data;

2.2.4 the **rights** that you have in relation to your personal data; and

2.2.5 how you can **contact us** about this Notice.

2.3 It is important that you read this privacy notice, together with our cookies notice and any other privacy notice we may provide on specific occasions when we are processing personal data about you, so that you are fully aware of how and why we are using your data. We have appointed a privacy and compliance officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, or our data protection policies, including any requests to exercise your legal rights, please contact the privacy and compliance officer using the details set out below.

3. WHAT PERSONAL DATA MAY WE COLLECT AND HOLD ABOUT YOU?

3.1 We will only collect, use and retain personal data about you that we believe we require for our purposes.

3.2 We will not collect, use or retain personal data about you "just for the sake of it".

3.3 We may process different kinds of personal data about you which we have collected from our website and which we have grouped together as follows:

3.3.1 **Identity and Contact Data** includes your name, address, telephone number, email address, your connection with Aysgarth School, and your child's name, date of birth and gender.

3.3.2 **Technical Data** includes internet protocol (IP) address, domain name, operating system, your login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

- 3.3.3 **Profile Data** includes your password and/or username for logging into or viewing the private section and pages of our website.
- 3.3.4 **Usage Data** includes data about how you use our website, the files you download, the pages viewed and the times and dates of these visits.
- 3.4 We do not collect any **special categories of personal data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinion and information about your health) or any information about criminal convictions and offences through our website, unless you provide that information to us. We ask that you do **not provide us** with any special categories of personal data via our website.

3.5 **If you fail to provide personal information**

Where, for example, you fail to provide all of the mandatory information in our online enquiry form, you will not be able to submit that form to us.

4. **HOW IS YOUR PERSONAL DATA COLLECTED?**

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

4.1.1 **Direct interactions.** You may give us your personal information when, for example:

- (a) sending us an e-mail via, for example, the "Contact Us" section of our website;
- (b) enquire about us via the relevant webform;
- (c) order Aysgarth branded merchandise via the relevant webform; and
- (d) send us an email to, for example, apply for a job vacancy, request full media articles, contact our staff members and governors.

4.1.2 **Automated technologies or interactions.** As you interact with our website, we will 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 cookie notice [here](#) for further details.

4.1.3 **Third party or publicly available sources.** We will receive personal data about you from various third parties. For example, [we will receive technical data from analytics providers such as Google].

5. **HOW DO WE USE AND SHARE YOUR PERSONAL DATA?**

5.1 We process personal data to enable us to further our charitable objects which are broadly:

- 5.1.1 To operate and manage Aysgarth School and to provide a high quality education to children in our care (and prospective pupils); and
- 5.1.2 To carry out such associated activities which are necessary to our operation and management of the School, and the other activities we undertake for our students, parents (prospective students and parents) and other key stakeholders.

5.2 Your personal information may be used by us (including our staff), and disclosed to third parties. For each of the purposes we have set out the legal basis on which we use and share your personal information in the table below.

We will only use your personal data for the purposes for which we originally collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or we are compelled to do so by law. 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.

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

| Purpose for Processing Your Personal Information | Type of Personal Information | Lawful Basis |
|--|--|---|
| <p>To process your enquiry including:</p> <p>(a) To communicate with you about our services</p> <p>(b) To assess the services which you may require from us</p> <p>(c) To update you on our services/changes to the same</p> | <p>Identity</p> <p>Contact</p> | <p>(a) Performance of a contract with you in particular to educate your child</p> <p>(b) Necessary for our legitimate interests (to assess the services which you may require from us)</p> |
| <p>To process your order for Aysgarth branded merchandise</p> <p>(a) to communicate with you about your order</p> <p>(b) to help produce your next school invoice</p> <p>(c) to fulfil your order</p> | <p>Identity</p> <p>Contact</p> | <p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p> |
| <p>To process your job application</p> | <p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Technical</p> | <p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to assess your skills, qualifications, and suitability for the role/work that you have applied for)</p> <p>(c) Necessary to comply with a legal obligation (to keep records related to our recruitment process and to comply with our legal and/or regulatory obligations)</p> |
| <p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Ensuring that you are granted access to private pages of our website.</p> | <p>Identity</p> <p>Contact</p> <p>Profile</p> | <p>(a) Necessary to comply with a legal obligation</p> <p>(b) Necessary for your legitimate interests (to enable you to use our website)</p> |
| <p>To administer and protect our business and this website (including troubleshooting, data</p> | <p>Identity</p> | <p>(a) Necessary for our legitimate interests (for running our charitable school business, provision of administration and</p> |

| Purpose for Processing Your Personal Information | Type of Personal Information | Lawful Basis |
|--|--|--|
| analysis, testing, system maintenance, support, reporting and hosting of data) | Contact Technical Usage | IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content to you and measure or understand the effectiveness of the content we provide to you | Identity Contact Profile Usage Technical | Necessary for our legitimate interests (to study how people use our website, to grow our charitable business and to inform our marketing strategy) |
| To use data analytics to improve our website, marketing, website user relationships and experiences | Technical Usage | Necessary for our legitimate interests (to define types of beneficiaries, to keep our website updated and relevant, to develop our charitable business and to inform our marketing strategy) |
| To assist with any transaction, or proposed transaction, with any third party/parties to whom we wish to sell, transfer or merger parts of our business or assets. | Identity Contact Profile Usage Technical | Necessary for our legitimate interests and those of our pupils, staff and other stakeholders (to ensure a seamless merger, sale, or transfer with a third party). |

6. HOW CAN YOU MANAGE COOKIES?

6.1 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 our cookies notice [here](#).

7. WHEN MIGHT WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?

7.1 We may share your personal data with third parties, including:

7.1.1 professional advisers (e.g. lawyers and accountants);

7.1.2 government authorities and regulators (e.g. HMRC, the Information Commissioner's Office, the Department for Education, the police, the local authority, NCTL, Independent Schools Inspectorate and the Charity Commission); and

7.1.3 the Aysgarth School Foundation or the Old Aysgarthian Association.

7.2 We will share your personal data with third parties on the grounds of either our legitimate interests, compliance with a legal obligation, the prevention and detection of crime or the apprehension and prosecution of offenders, or vital interests, as appropriate in the circumstances.

8. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

- 8.1 We will only retain your personal data for as long as is reasonably necessary for the purpose for which we collect it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. The exact period will therefore depend on the purpose for which we hold your personal data. For example, where we hold personal data:
- 8.1.1 To comply with a legal or regulatory obligation, we will keep that information for at least as long as is required to comply with that obligation.
 - 8.1.2 To deal with a complaint that you have raised, we will keep the information for a period of seven years following resolution of the complaint in accordance with our complaints procedure or following conclusion of our complaints procedure (whichever is earliest).
 - 8.1.3 To deal with enquiries submitted by you in relation to the enrolment of your child/children at our school. Please also refer to our privacy notice for prospective pupils and their parents which is available here.
 - 8.1.4 To access your application for a job with us, we will hold that information in accordance with our relevant privacy policy for job applicants which is available here.
 - 8.1.5 To help to improve our website and our offering as a school, we will hold your personal information for at least as long as required to design, implement and monitor any such improvements.
- 8.2 We may extend the period for which we keep your personal data in the event that legal proceedings are brought in relation to or involving you. In those circumstances we may need to retain some relevant personal information for as long as is necessary for the purposes of such litigation.

9. DO WE SEND YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA")?

- 9.1 We will not, as a matter of course, transfer your data outside the EEA.
- 9.2 If we were to transfer your personal data out of the EEA, we will ensure a similar degree of protection is afforded to it by ensuring appropriate safeguards are in place, for example:
- 9.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
 - 9.2.2 Where we use providers based in the US (e.g. Google Analytics), we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

10. HOW SECURE IS THE PERSONAL DATA THAT WE COLLECT ABOUT YOU?

- 10.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 10.2 We also limit access to your personal data to those employees, workers, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions in accordance with this notice and will be subject to a duty of confidentiality.
- 10.3 We have processes in place to ensure that any personal data that we keep in hard copy form is stored securely. Where we keep personal data in soft copy, that is stored either on our secure servers or on secure servers operated by a third party.
- 10.4 Please note that the transmission of data via the internet is not completely secure. Although we will do our best to protect your personal data transmitted via our website, we cannot guarantee

the security of your personal data transmitted in this way and any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

- 10.5 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator(s) of a suspected breach where we are legally required to do so.

11. WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?

- 11.1 You have certain rights in relation to your personal data. Those apply in certain circumstances and are subject to certain exemptions. In summary, those rights are:

| The Rights | Summary of Your Rights |
|---|---|
| Right of access to your personal data | You have the right to receive a copy of your personal data that we hold about you. |
| Right to rectify your personal data | You have the right to ask us to correct the personal data that we hold about you where it is incorrect or incomplete. If any of the personal data that we hold about you changes then we encourage you to please let us know as soon as possible so that we can ensure our records about you are accurate and up-to-date. |
| Right to erasure of your personal data | You have the right to request that we erase all data we hold about you if the data is no longer being used for the purposes you have consented to or if you revoke any consent given to us processing that data. |
| Right to restrict the use of your personal data | You have the right to request that we suspend our use of your personal data in certain circumstances. |
| Right to data portability | You have the right to request that we copy or transfer your personal data to another service provider. |
| Right to object to the use of your personal data | You have the right to object to the use of your personal data. |
| Right to withdraw consent | You have the right to withdraw your consent at any time where we rely on consent to process your personal data. |
| Right to complain to the data protection regulator for England and Wales | You have the right to complain to the Information Commissioner's Office (otherwise known as the "ICO") where you think we have not used your personal data in accordance with data protection law. You can contact the ICO on 0303 123 1113 or by visiting their website at www.ico.org.uk . Please note that we are registered with the ICO as a data controller under number Z1316900. It may be useful to quote this number in your correspondence to the ICO. |

12. WHAT OTHER INFORMATION SHOULD YOU BE AWARE OF?

- 12.1 This website includes links to third party websites, plug-ins and applications including , for example, our Facebook, Instagram and Twitter pages; YouTube; the websites of relevant senior

schools; the websites of local accommodation (including B&Bs); and the websites of relevant associations and directories. Clicking on those links or enabling those connections may allow third parties to collect, use or share data about you. We do not control those third party websites and are not responsible for their privacy statements. When you leave our website, we therefore encourage you to read the privacy policy of every website you visit.

13. WHEN AND HOW CAN WE MAKE CHANGES TO THIS NOTICE?

13.1 We keep our privacy notice under regular review and may update this Notice at any time. The changes will come into effect once the updated Notice is published on our website.

14. HOW CAN YOU GET IN CONTACT WITH US?

14.1 If you have any questions regarding this Notice, or the way we use your personal data, or wish to exercise any of your rights set out in section 11 above then please contact us at.

Aysgarth School Trust

Newton le Willows

Bedale

North Yorkshire

DL81TF

Privacy and compliance officer afrancis@Aysgarthschool.co.uk

This Notice was adopted in 15/04/2020