

The American School in London

Privacy notice: General visitors

The current version of any policy, procedure, protocol or guideline is the version held on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.

Responsible party	Director of Technology
Approved by	Director of Safeguarding and Compliance
Approval date	September 2025

The American School in London Educational Trust Limited (ASL) respects the privacy of every individual who visits the ASL campus and website. This privacy notice demonstrates our commitment to your privacy and outlines the information ASL may collect about you from your visit to this website and how this information will be handled.

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About this document

This policy is intended to provide information about how the School will use (or “process”) personal data about individuals who visit the ASL campus or website.

This information is provided because data protection law gives individuals rights to understand how their data is used. Visitors are encouraged to read this privacy notice and understand the school’s obligations and commitment to data protection.

This document also applies in addition to the school’s other relevant terms and conditions and policies, including:

- any contract between the School and an individual, such as the terms and conditions of employment, and any applicable employee handbook
- the school’s safe working practices, and child protection and health and safety policies
- the school’s CCTV policy, responsible use agreement, and data retention schedule.

This privacy notice also applies alongside any other information the School may provide about particular uses of personal data, for example when collecting data via an online or paper form.

What personal data is processed and how it is collected

Generally, the School receives personal data from the individual directly (including, in the case of students, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication such as email.

We do not collect personally identifiable information about you when you visit our website unless you have provided it voluntarily. By providing such information to us, you are giving us your consent to contact you; you can opt out of future mailings by following the ‘unsubscribe’ links in the emails or by contacting the [data protection officers](#). We will use your data to respond to your enquiry and may send you communications by email, text message or mail. These may include information about upcoming events, fundraising and school news. ASL will not sell, rent or market personal data about you to third parties.

Cookies are small text files that are placed on your computer or mobile phone when you browse websites. We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g., Mac or Windows, which helps to identify when our site isn’t working as it should for particular technologies), how long they spend on the site, what pages they look at, etc. This helps us to improve our website continuously.

Cookies on asl.org:

- make our website work as you would expect
- save you having to login every time you visit the site
- remember your settings during and between visits
- improve the speed/security of the site
- help you get to what you need faster.

We do not use cookies to:

- collect any personally identifiable information (without your express permission)
- pass data to advertising networks
- pass personally identifiable data to third parties
- pay sales commissions.

When you visit the ASL campus, we may collect certain personal data to identify you and maintain records of individuals on site for security and emergency purposes. This may include by way of example:

- Name, telephone number, email and other contact information
- Portrait photo taken for ASL visitor badge ID
- Images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children)
- Car details (about those who use our car parking facilities).

Who has access to personal data and with whom we disclose it

Occasionally, the School will need to disclose personal information relating to its community with third parties, such as:

- professional advisors (e.g., lawyers, insurers, PR advisers and accountants)
- government authorities (e.g., HMRC, DfE, police or the local authority).

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e., on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the school nurses and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent
- safeguarding files
- accident reports.

Household directories

The following contact details will be included in the School's online household directory by default:

- Household name
- Your child(ren)'s full names and grade level
- Parent/guardian full name(s)
- Parent/guardian email address(es)
- Home address
- Home phone
- Mobile phone

The online directory is in the Veracross parent portal and is only accessible to current families, and employees via the website. You can update your directory visibility preferences by selecting the 'Update family profile' button in [Veracross](#), and navigating to the 'Directory preferences' tab.

It is understood that the contents of the online directory will only be used to facilitate school-related arrangements at ASL, or for purely social contact between consenting families. As a community, we operate on trust and would ask that personal data and contact details not be used for any other purpose without the specific consent of the person whose data you wish to use. Any violations of this trust will be taken very seriously.

How long your information is kept

The School will retain personal data securely and as long as it is necessary to keep it for a legitimate and lawful reason, and inline with ASL's retention policy. Personal data captured at the front desk when visitors arrive to campus is kept for up to 12 months, however, incident reports and safeguarding files containing personal data will need to be kept much longer, in accordance with specific legal requirements. The School maintains a data retention schedule, which dictates how long personal and special category data is kept and how it is to be archived and disposed of in accordance with data protection law.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data you believe to be relevant is considered for erasure, please contact the [data protection officers](#). Please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data following such request.

Your rights

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

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where data protection law allows it).

- You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information that identifies other individuals, or information that is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action).
- The School is also not required to disclose any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.
- Request correction of the personal information 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 information. This enables you to ask the School to delete or remove personal information where there is no good reason for the School to continue to process it. You also have the right to ask the School to delete or remove your personal information where you have exercised your right to object to processing.
 - You may be aware of the "right to be forgotten," however, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this privacy notice. All such requests will be considered on their own merits.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are: participation in certain types of activities and certain types of fundraising and school advancement functions. Please be aware, however, that the School may not be relying on consent but has another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this privacy notice, or may otherwise exist under some form of contract or agreement with the individual (e.g., an employment or parent contract, or because a purchase of goods, services or membership of an organization, such as a parent or an alumni association has been requested).
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal

information to another party, please contact the [data protection officers](#) in writing. The School will endeavor to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights); however, 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.

Data accuracy and security

The School will endeavor to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the School of any significant changes to important information, such as contact details, held about them.

Individuals have the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under data protection law).

The School will take appropriate technical and organizational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All employees will be made aware of this policy and their duties under data protection law and receive relevant training.

This notice

The School will update this privacy notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Contact and complaints

Any comments or queries on this policy should be directed to divisional offices or in writing to the [data protection officers](#).

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with data protection law, they should notify the [data protection officers](#). You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.