Commercial Customers and Visitors Privacy Notice

Who We Are

Culford School is an Independent Boarding and Day School for pupils aged between 1 to 18 years and is part of the Methodist Independent Schools Trust. Registered Office: 27 Tavistock Square, London, WC1H 9HH. Charity No. 1142794. Company No.7649422.

Culford School is the controller and processor of data for Culford Nursery, Senior, Preparatory and Pre Preparatory School, Sports and Tennis Centre, and commercial lettings and activities.

What This Privacy Notice Is For

This notice explains how the School collects, uses, and holds (processes) personal data regarding:

- **Commercial Customers:** Individuals using the Sports Centre, Tennis Centre or other sports facilities.
- **Letting Groups:** Organisations or individuals renting school buildings and accommodation.
- **Sports Clubs:** Clubs utilising the school site for training or events.
- **Visitors:** Individuals visiting the school for any purpose.
- **General Public:** Individuals accessing public and permissive footpaths on the school grounds.

This notice is provided in accordance with data protection law to ensure you understand your rights regarding the information we hold.

Why We Process Your Data

We process personal data to ensure the safety, security, and smooth operation of our site and to manage our commercial relationships. Key reasons include:

- **Service Delivery:** To fulfil our ordinary duties and deliver the services you have requested or contracted.
- **Site Security and Safety:** Managing site access, monitoring CCTV, and recording visitor information to ensure the safeguarding of our pupils and staff.
- **Commercial Operations:** Administering contracts, processing payments, and managing bookings for sports facilities, holiday clubs, events, and lettings.
- **Public Access Management:** Managing the safe use of school grounds and public footpaths.

What Data We Collect

Depending on your interaction with the School, we may collect:

- **Contact Details:** Names, addresses, telephone numbers, and email addresses.
- **Personal Information:** Date of birth and relevant health information.
- **Account and Contractual Information:** Booking details, certificate attainments, and contractual terms.
- **Vehicle Information:** Details of drivers accessing the site, recorded via Automatic Number Plate Recognition (ANPR).
- **Visual Information:** Photographs or video recordings (e.g., CCTV or sports performance cameras).
- **Financial Information:** Purchase history, payment processing details, and account history.
- **Correspondence:** Notes from meetings, emails, and information relating to complaints or compliments.

Special Category Data

We may process special category information in limited circumstances:

- **Religious Beliefs:** To support specific dietary or organisational requirements.
- **Health Information:** To manage medical needs for children in our care, support dietary requirements, or complete accident reports.

How We Collect Your Data

Data is collected through various channels:

- **Directly From You:** Through booking resources (e.g., a court or pitch), purchasing memberships, or signing up for courses and activities or where you enter the school grounds.
- **From Third Parties:** Where a parent or guardian makes a booking for a child, or where a club or coach uploads information on your behalf.

Who We Share Data With

We limit access to your data to those who need it and may share it with:

- **Service Providers:** Contractors supporting our operations (e.g. IT, accounting, catering), subject to strict security assurances.
- **Relevant Third Parties:** Parents/guardians, or your specific club/coach for membership and booking purposes.
- **Authorities:** The police, or government bodies when required by law, such as for fraud prevention or legal proceedings.
- **Professional Advisers:** lawyers, insurers, PR advisers, accountants

Data Relating to Children

Children aged 13 and above are generally considered mature enough to exercise their own data rights. However, this is assessed on a case-by-case basis depending on the child's maturity and the nature of the data requested. Parents may often receive information about their children based on a legitimate interest, even without the child's explicit consent.

Your Rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Compliance Office at compliance@culford.co.uk

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time.

Responsibility for Data Protection

The School has appointed the Head of Compliance as the Data Protection Lead who will deal with your requests and enquiries concerning the School's processing of your personal data (see section on Your Rights above) and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law. You can contact the School's Head of Compliance using these details:

The Head of Compliance, Culford School, Culford, Bury St Edmunds, Suffolk, IP28 6TX or email Compliance@culford.co.uk

Data Protection Complaints

If you believe that we have broken your data protection or privacy rights, or you are unhappy with how the school has managed your data, you can complain to us direct by contacting the Compliance Office Compliance@culford.co.uk. Culford School's Data Protection Complaints Policy has further information about the complaints process.

If you are not happy with our response, or you want to contact the UK Information Commissioner's Office, which regulates and enforces data protection law in the UK, you can find details about how to do this at www.ico.org.uk.

If you have any questions about this privacy notice, please contact the Compliance Office on the details above.