



## PRIVACY POLICY

**SCHOOL DIVISION:** WHOLE  
**POLICY DIVISION:** GENERAL  
**POLICY OWNER:** Head of SENIOR  
**DATE:** September 2018

**Claremont School** is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection, the Data Controller is Claremont School.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

This Policy covers Claremont School in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information, please contact the school at [ed.dickie@claremontschool.co.uk](mailto:ed.dickie@claremontschool.co.uk), [rebecca.hurton@claremontschool.co.uk](mailto:rebecca.hurton@claremontschool.co.uk), [celia.ackerley@claremontschool.co.uk](mailto:celia.ackerley@claremontschool.co.uk) or by post to **Claremont School, Bodiam Robertsbridge, East Sussex TN32 5UJ**.

### What type of personal information we collect

The type and amount of information we collect depends on why you are providing it. The information we collect when you make an enquiry includes:-

- First name
- Last name
- Job title
- Gender
- Preferred pronoun
- Date of birth
- Email (for login)
- Address
- Postcode
- Geo-location data (your geographical location based on your IP address)

If you are a job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

## **How we collect information**

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- visit our website
- enquire about our activities or services
- sign up to receive news about our activities
- create or update a profile
- post content onto our website/social media sites
- attend a meeting with us and provide us with information
- take part in our events
- contact us in any way including online, email, phone, SMS, social media or post

## **Where we collect information from**

We collect information:

- (1) from you when you give it to us directly: you may provide your details when you ask us for information, attend our events or contact us for any other reason
- (2) when you give it to us indirectly: your information may be shared with us by other organisations. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.
- (3) when you have given other organisations permission to share it: your information may be provided to us by other organisations if you have given them your permission. This might for example be a business working with us or when you buy a product or service from a third party organisation. The information we receive from other organisations depends on your settings or the option responses you have given them.
- (4) when you use our website: information about you is recorded and stored when you use our website. See the information about the use of cookies under that heading below.
- (5) When it is available on social media: depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

## **How we use your information**

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- providing you with the information or services you have asked for
- sending you communications with your consent that may be of interest, including marketing information about our services and activities
- when necessary, for carrying out your obligations under any contract between us
- seeking your views on the services or activities we carry on, so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted
- analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness
- processing job applications

## **Use of Aggregated Data**

Where Data can be aggregated (and anonymised), we may use this for research purposes without restriction.

For example, we may monitor customer traffic patterns, Site and Services usage and related information in order to optimise users' usage of the Site and Services and we may give aggregated statistics to a reputable third-party.

We are entitled to do this because the resulting data will not personal identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

## **Our legal basis for processing your information**

The use of your information for the purposes set out above is lawful because one or more of the following applies:

where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at [anna.kerman@claremontschool.co.uk](mailto:anna.kerman@claremontschool.co.uk), [lily.lam@claremontschool.co.uk](mailto:lily.lam@claremontschool.co.uk). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned;

- it is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract;
- it is necessary to comply with our legal obligations.
- where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for our legitimate interests in relation to providing the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request;

If you want to contact us about your marketing preferences please contact at [anna.kerman@claremontschool.co.uk](mailto:anna.kerman@claremontschool.co.uk) or call on (+44) 1580 830396.

## **How we keep your information safe**

We understand the importance of keeping your personal information secure and take appropriate steps to safeguard it. Personal and sensitive data undergoes security reviews and any financial or sensitive personal information adheres to our Data Protection Policy.

We always ensure only authorised persons have access to your information, which means only our employees and contractors, and that everyone who has access is appropriately trained to manage your information.

No data transmission over the internet can be guaranteed to be completely secure. So, whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

## **Who has access to your information?**

- Third parties who provide services for us, for example collecting or processing data and sending mailings. We select our third party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do
- Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any event
- Analytics and search engine providers that help us to improve our website and its use
- Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another business. In such event, we will take steps to ensure your privacy rights will be protected by the third party

Owing to matters such as financial or technical considerations, the information you provide to us may be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. This may be because data is stored on servers outside the EEA or we use suppliers based outside the EEA. We meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA. We do this

by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a data processing agreement which contains model EU clauses.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

## **Keeping your information up to date**

- Please would you let us know if your contact details change. You can do so by contacting us at [lily.lam@claremontschool.co.uk](mailto:lily.lam@claremontschool.co.uk) or on (+44) 1580 830396.

## **Cookies**

In addition to the information which you supply to us, information and data may be automatically collected through the use of cookies. Cookies are small text files employed on the Site to recognise repeat users and allow us to observe behaviour and compile aggregate data in order to improve the Site for you. For example, cookies will tell us whether you viewed the Site with sound or with text on your last visit. Cookies also allow us to count the number of unique and return visitors to our Site. Some of our associated companies may themselves use cookies on their own websites. We have no access to, or control of these cookies, should this occur.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The law states that we can store cookies on your machine if they are essential to the operation of the Site, but that for all others we need your permission to do so.

The list below explains the cookies we use and why:

Cookie Description	Name	Purpose
Google Analytics	_ga	Used to distinguish users
Google Analytics	_gid	Used to distinguish users
Google Analytics	_gat	Used to throttle request rate
CloudFlare	_cfduid	Identify individual clients behind a shared IP address and apply security settings on a per-client basis.  This cookie is strictly necessary for Cloudflare's security features and cannot be turned off.
addThis	_atuvc	Enable visitors to share content with a range of networking and sharing platforms. It stores an updated page share count.
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### Opting out of cookies

If you do not wish to receive cookies from us or any other website, you should be able to turn cookies off on your web browser: please follow your browser provider’s instruction in order to do so.

Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity.

Please contact us on [ed.dickie@claremontschool.co.uk](mailto:ed.dickie@claremontschool.co.uk) for our Records Retention Policy.

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for two years. We may periodically ask you to renew your consent.

If you ask us to stop contacting you with marketing materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

## Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a subject access request. Such requests have to be made in writing. Please note that from 25 May 2018, no charge may be made under the GDPR except in very limited circumstances (which will be explained to you upon request)<sup>1</sup>. More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request, please contact us at [ed.dickie@claremontschool.co.uk](mailto:ed.dickie@claremontschool.co.uk), [rebecca.hurton@claremontschool.co.uk](mailto:rebecca.hurton@claremontschool.co.uk), [celia.ackerley@claremontschool.co.uk](mailto:celia.ackerley@claremontschool.co.uk)

You also have the following rights:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the “*right to be forgotten*”);
- the right to restrict the way in which we are dealing with and using your information; and
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the “*right to portability*”);
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

All of these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact the Head of Marketing and Admissions at the above address.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner’s Office. Further details about how to complain can be found [here](#).

## Surveys and user groups

We always aim to improve the services we offer. As a result, we occasionally canvass our customers using surveys (where the customer has opted in for this).. Participation in surveys is voluntary, and you are under no obligation to reply to any survey you might receive from

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<sup>1</sup> I.e. if the request is 'manifestly unfounded or excessive', or, further copies are requested, the data controller may charge a reasonable administration fee.

us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all other customer information.

### **Changes to this Privacy Policy**

This Policy may be changed from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information. We recommend that you read this Privacy Policy each time you consider giving your personal information to us.

#### **1. Policy Owner**

The policy owner is the Head of the Senior School.

#### **2. Issue Date**

Issue date: September 2018.

#### **3. Review Date**

This policy will be reviewed annually. The next review is due in September 2019.

**Ratified by WSLT:**



**Mr E Dickie**  
**Head of Senior School**

**September 2018**