



Park House Privacy Statement March 2018

Park House School (PHS) is committed to protecting your personal information when you use our services. This Privacy Policy relates to us using any personal information that we collect from you via the following online services:

- Any PHS website that links to this Privacy Policy
- Social media or official PHS content on other websites
- Mobile device applications (apps)

It also relates to us using any personal information that you provide by phone, SMS, email, in letters and other correspondence, and in person.

This Privacy Policy explains the following:

- What information we may collect about you
- How we will use information we collect about you
- How long we hold information about you
- The legal basis for processing your information
- When we may use your details to contact you
- Whether we will disclose your details to anyone else
- Your rights regarding the personal information you provide to us
- The use of cookies on our websites and how you can reject them

When saying “we”, “our” or “PHS”, we are referring to Park House School.

PHS is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use it in line with all applicable laws concerning the protection of personal information (these laws are referred to collectively in this Privacy and Cookies Policy as the "data protection laws"). PHS websites contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, and also likely use cookies, so we urge you to review them. They govern the use of personal information you submit when visiting these websites, which may also be collected via cookies. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such sites is at your own risk.

We may receive your personal information when you: participate in, access or sign up to any of our services, activities or online content – such as newsletters, competitions, phone or email us, vote, donate money to PHS or reserve a place at an event.

Please note that we may need additional, sometimes sensitive, personal information from you such as ethnic origin or health (eg if you're applying for a job). In these circumstances, we will explain further why we are collecting your information and how we will use it. Be aware that sensitive personal information may also be known as 'special categories of personal information' in some policies you read about data protection.

What types of personal data do we collect?

- Name, nationality, gender preference and date of birth
- Contact details including postal address, email and phone
- Your communication preference
- Employment information (where relevant), including name of business, industry, job title, level of seniority and number of years of experience
- Prior education, including university attended, subject studied and year of graduation
- Test scores ie KS2 indicators, SAT tests, CAT tests
- Dietary requirements, including allergies

We may ask for consent to send you marketing communications about our products and services. You will be able to opt out of these communications at any point by selecting the 'opt out' option at the bottom of each email we send you.

Whenever processing data for these purposes, we will ensure we always keep your personal data rights in high regard and take account of them. You have the right to object to this processing if you wish. Please see 'You have the following rights' section below for more details. We will ask for authorisation before using your personal information for any other means.

We will hold your personal information on our systems for as long as necessary for the relevant activity, or as long as is set out in any relevant contract you hold with PHS.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

We offer regular emails to let you know about our products and services and to inform you of the latest PHS insights. We may also invite you to take part in surveys about our products and services or issues affecting PHS.

PHS may personalise the message content based on any information you provide to us and your use of our platforms.

You can update your communication preferences and stop receiving any future emails at any time by following the convenient links located at the bottom of our emails. Requests submitted in this manner are then processed.

If you believe you have received unwanted, unsolicited emails sent by or purporting to be from PHS, please forward a copy of that email with your comments to our Data Compliance Officer for review.

Depending on the nature of the third-party mailing, we may, in order to comply with applicable laws, provide the third party with a suppression list of contacts to exclude from their list. The third party does not have permission to keep or market to contacts on this list, or to use it in any way other than as a suppression list for a mailing they are providing on our behalf.

Apart from meeting the needs of your request, we will never share or sell your data to third parties to use for their own purposes unless we are required to do so by law. For example, we would do this when receiving a court order or for the purposes of prevention of fraud or other crime.

Your information may be shared with our educational partners where necessary, for example to educational establishments you may be moving to.

PHS sometimes uses third parties to process your information on our behalf, for example to provide services or analysis. We require these third parties to comply strictly with your instructions and that they do not use your personal information for their own business purposes, unless you have explicitly consented to them using your personal information in this way.

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our partner's servers are located in a country outside the EEA. These countries may not have similar data protection laws to the UK; however, we will take steps to make sure they provide an adequate level of protection in accordance with UK Data Protection Law. By submitting your personal information to us, you agree to this transfer to, storing or processing of data at a location outside the EEA.

You have following rights:

Right of access.

You have the right to request a copy of the information we hold about you via a Subject Access Request.

You have the right to request a copy of the personal information PHS holds about you, except where releasing that information would breach another person's privacy, or where an exemption applies, and to have any inaccuracies corrected.

If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to, and
- let you have a copy of the information in an intelligible form.

You may request in writing that PHS discloses details of data which it holds about you and the purpose for which such data is held. A 'Subject Access Request Form' will be supplied upon request. Where necessary, we may need proof of identity. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

If we hold information about you, you can ask us to correct any mistakes by contacting the Data Compliance Officer.

Please address requests and questions about this, or any other issue related to this policy, to the Data Compliance Officer.

Right of rectification

You have the right to update or amend the information we hold about you if it is incorrect.

You can do this by updating your profile online or by contacting the Data Compliance Officer.

Right of erasure

You have the right to ask us to remove your personal information from our records.

If you request that your data be erased, we will securely dispose of it. We will continue to retain a core set of personal data (name, email address, unique PHS identification reference) to ensure we do not contact you again in the future.

Please address requests to delete your data to the Data Compliance Officer.

Right to restrict processing

You have the right to 'block' or suppress processing of your personal data. When processing is restricted, we are permitted to store the personal data but not further process it. We can retain just enough information about you to ensure that the restriction is respected in future.

If you request that your data processing be blocked, we will continue to retain a core set of personal data (name, email address, unique PHS identification reference) to ensure we do not contact you again in the future.

Please address requests to delete your data to the Data Compliance Officer.

Right to data portability

You have the right to obtain a copy of your personal data so that it can be reused for your own purposes in another IT environment.

If you want to request a copy of your personal data then please address requests to the Data Compliance Officer.

Right to object to processing

You have a right to object by withdrawing your consent at any time.

Right to make a complaint to the supervisory authority

You have the right to make a complaint to the Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Tel: +44 (0)303 123 1113 (local rate) Web: ico.org.uk

June 2018