

## **NEW COLLEGE SCHOOL WEBSITE PRIVACY POLICY**

### **INTRODUCTION**

Welcome to New College School's privacy notice.

New College School respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- 1. Important Information and Who We Are**
- 2. The Data We Collect About You**
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## IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this privacy notice

This privacy notice aims to give you information on how New College School collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data protection law requires New College School, as data controller for your data:

- To process your data in a lawful, fair and transparent way;
- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

### Controller

New College School is the controller and responsible for your personal data (collectively referred to as **the School, we, us** or **our** in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights* please contact the DPO using the details set out below.

### Contact details

Our full details are:

Full name of legal entity: New College School

Name or title of DPO: Ms Tara Jay at ClearComm ([tara.jay@clearcomm.org](mailto:tara.jay@clearcomm.org))

Email address: [office@newcollegeschool.org](mailto:office@newcollegeschool.org)

Postal address: Savile Road, Oxford, OX1 3UA

Telephone number: 01865 285560

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 23/05/2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the DPO of any changes in your data at the following email address: [office@newcollegeschool.org](mailto:office@newcollegeschool.org)

## THIRD-PARTY LINKS AND SOCIAL MEDIA

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We and organisations connected with us have a social media presence for the purpose of engaging with our students, alumni and visitors.

If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy notice of every website or forum that you visit or use.

## THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender and photographs.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Professional data:** includes academic qualifications and achievements, references, profession, job title, employer and professional history.
- **Welfare data:** includes grievance and disciplinary information, information relating to criminal convictions and allegations of criminal activity, medical records and information including dietary requirements and religious information.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password to any School online service, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We refer to the above categories of data in the information table which can be found below.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Much of this information is provided by way of **Welfare Data** and identified as such in our information tables. We may also collect information about criminal convictions and offences. Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. All such information is collected in

accordance with this privacy notice. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your Identity, Contact, Professional and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enrol with us;
  - make a donation to the School;
  - request access to our facilities;
  - keep in touch with us;
  - make a payment to us for events or services; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy below for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below (further details can be found in the information table below):
  - Technical Data from the following parties:
    - analytics providers such as Google based outside the EU; and
    - search information providers based inside **OR** outside the EU.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Professional Data from your previous educational establishments and/or employers if they provide references to the School.
  - Identity and Contact Data from members of New College, family members, friends, visitors to the School and other contacts who may provide us with information about you.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

See the table below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

## **DISCLOSURES OF YOUR PERSONAL DATA**

We do not sell your personal data to third parties. We will only share your personal data with third parties where we are allowed or required to do so by law. We set out in the relevant table the identity and purpose of such disclosure where it is possible for us to do so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Third parties who process your data on our behalf are subject to contracts under which their processing activities are managed. Where your personal data is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

## **INTERNATIONAL TRANSFERS**

Some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 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. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, 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 the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To enrol our pupils	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial	(a) Performance of contract	We access IT services which are provided by the University of Oxford supplies to New College.  New College process data in relation to choristers involved with the New College Choir.
To deliver teaching, catering and extra-curricular activities to our pupils including to manage our pupils involvement in New College Choir	(a) Identity (a) Contact (b) (c) Profile (d) Welfare (e) Financial (f) Technical (g) Profile (h) Usage	(a) Performance of a contract; (b) Public Task (in delivering teaching); (c) Necessary to comply with a legal obligation; (d) Necessary for our legitimate interests (ensuring that you have an appropriate service on an ongoing basis)	We engage third parties to administer document destruction services on our behalf.  Third parties providing financial accounting software are engaged to maintain and manage our financial records.
To protect and ensure the health, safety and welfare of our pupils during their enrolment with us and for the purposes of safeguarding including the retention of emergency contact details.	(a) Identity (a) Contact (b) (c) Profile	(a) Performance of a contract with you; (a) Consent (of the parent where applicable); (b) (c) Necessary to comply with a legal obligation;	

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
	(d) Welfare	(d) Necessary for our legitimate interests (in ensuring a safe and comfortable environment for our pupils)	We engage third parties to provide counselling services at the School.
To manage payments, fees and charges and collect and recover money owed to us	(a) Identity (b) Contact (c) Professional (a) Welfare (b) Financial (c) Transaction	(a) Performance of a contract; (b) Necessary for our legitimate interests (to recover debts due to us)	
To use data analytics to improve our website, services, marketing, relationships and experiences	(a) Technical (b) Usage (c) Profile (d) Marketing and Communications	(a) Necessary for our legitimate interests (to keep our website updated and relevant, to develop our facilities and to inform our marketing strategy)	
To provide references	(a) Identity (b) Contact (c) Professional (d) Welfare	(a) Consent	

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer of information
To manage our relationship with you which will include notifying you about changes to our terms, policies and procedures.	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Marketing and communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you;</li> <li>(b) Necessary to comply with a legal obligation.</li> </ul>	
To enable you to partake in events and make suggestions and recommendations to you about events that may be of interest to you.	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(a) Professional</li> <li>(b) Financial</li> <li>(c) Transaction</li> <li>(d) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you;</li> <li>(b) Consent (in relation to your e-marketing preferences);</li> <li>(c) Necessary for our legitimate interests (to deliver you information about our activities for your possible participation)</li> </ul>	

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you attended one of our events or accessed one of our facilities and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside of the School for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of services provided to you or other use of or access to our facilities or services.

## **Cookies**

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 cookie policy below.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

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.

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

## **DATA SECURITY**

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## DATA RETENTION

### How long will you use my personal data for?

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#).

By law we have to keep some basic information (including Contact, Identity, Financial and Transaction Data) for pre-determined periods such as for tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- The right to have access to your personal data
- The right to request correction of your personal data
- The right to request erasure of your personal data
- The right to object to processing of your personal data
- The right to request restriction of processing your personal data
- The right to request transfer of your personal data
- The right to withdraw consent
- The right to object to any direct marketing
- The right to object to any automated decision-making

Information about these legal rights can be found in the Glossary. If you wish to exercise any of the rights set out above, please Contact us. Some of your rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your

consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

**Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.

**Object to automated decision-making** about you which produces legal effects or otherwise significantly affects you.