



## **PARENT PRIVACY NOTICE**

d'Overbroeck's is a "data controller" under data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Your privacy is important to us and we want to keep your personal information safe. This privacy notice tells you how we do that and sets out your rights when it comes to the personal information that we hold about you.

The School only holds the personal information we are permitted to hold about you, and only uses it for limited purposes relating to your child's education, health and wellbeing at the School.

### **WHAT KIND OF INFORMATION DO WE COLLECT ABOUT YOU?**

- Your personal information (such as your name, title, addresses, telephone numbers, email addresses, marital status, profession)
- Your personal information as it relates to any concerns or complaints you have raised with the School
- Where asked by the School, your consent (or objection) for your child to participate in School trips or for us to use certain personal information about your child
- Where appropriate, information about your health and welfare, and the health and welfare history of your family
- Where appropriate, criminal records information if you volunteer for School outings or activities where a DBS check is required
- Bank and financial information, particularly with regard to the payment of School fees
- Financial and personal information in support of an application for a means-tested bursary
- Other financial information in connection with fees in advance payments in accordance with anti-money laundering law
- Information from CCTV cameras when you visit the School site
- Information about your education, qualifications, professional experience, hobbies and interests, where you have provided this to us voluntarily for use in School publications or at School events.

### **HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

We collect personal information from you directly. This may be through a form or meeting, or simply in our day-to-day contact with you (such as emails, conversations and via an online portal).

From time to time we may also collect information about you and your child supplied by others. For example, we may receive personal information about you in admissions forms from your child's previous school or from doctors, professionals or authorities.

Some of the personal information you provide to us is mandatory, which means that you must provide it to us so that we can provide our services to you and your child. Other personal information you provide to us is optional, which means that you may decide not to provide it to us. We will let you know when the personal information we request is optional.

### **WHY DO WE COLLECT YOUR PERSONAL INFORMATION?**

We use your personal information:

1. to decide whether your child can be admitted to the School
2. to decide whether your child is eligible for a bursary or scholarship
3. to facilitate the payment of School fees
4. to support your child's learning and education
5. to monitor and report on your child's progress
6. to make sure your child's health and wellbeing is looked after
7. to make sure we provide your child with a high quality of education
8. to ensure the School complies with the law and meets its legal obligations.

You can find more information about these purposes below.

### **THE LAWFUL BASIS FOR USING YOUR PERSONAL INFORMATION**

Most of the personal information we collect about you is needed to make sure we are able to fulfil our obligations to you under the parent contract. For example, we require your personal contact details to fulfil our contractual obligations to keep you informed of your child's health, wellbeing and educational development. We also use your personal information to make sure that the School is acting within the law and meets its legal obligations.

There are also some situations where we use your personal information for other reasons (these are known as the "legitimate interests" of the School). This will usually be the case when the parent contract we have with you does not apply (or is not yet in place) or when there is no specific law which requires us to use your personal information. For example, we will use your personal information when deciding whether your child can be admitted to the School and when we ask for professional advice from someone outside the School.

We may also rely on your informed and freely given consent to use your personal information. For instance when you agree to us using your personal information when giving pupils career guidance (including at career events).

It is important to be aware that, where appropriate, we also use some sensitive personal information about you, such as your medical and health information. This information is used to ensure your child's welfare and provide us with the information we require to meet your child's specific needs.

## **WHO DO WE SHARE YOUR DATA WITH?**

We routinely share your personal information with:

1. schools that your child attends after leaving us
2. our local authority
3. the Department for Education, and
4. the Oxford International Education Group (OIEG)

We share your information with OIEG, the School's parent company, so that we may make efficient use of our resources. OIEG may also receive information that you have consented to providing us with for the purposes of giving career guidance to pupils. We may also share your data with others where we are required or permitted to do so by law, or where we have a legitimate interest in sharing your personal information. This might include the Independent School's Inspectorate, the Charity Commission, Ofsted, professional advisers, auditors, or other regulators. It may also include companies who carry out research to help us with our future planning for the school, e.g. RSAcademics Ltd.

## **HOW SECURE IS MY INFORMATION WHEN OTHERS USE IT?**

All our service providers have to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only allow them to use your personal data for specified purposes and in accordance with our instructions.

## **TRANSFERRING STUDENT, PARENT AND GUARDIAN DATA INTERNATIONALLY**

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area.

We will only transfer personal data to a country or territory outside the European Economic Area:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Information; or
- where we have put in place appropriate safeguards to ensure that your Personal Information is protected (for example where both parties involved in the transfer have signed standard data protection clauses adopted by the European Commission); or
- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defence of legal claims.

You can request further detail about the safeguards that we have in place in respect of transfers of Personal Information outside of the EEA and where applicable a copy of the standard data protection clauses that we have in place, by contacting Tracy Roslyn, Data Compliance Administrator, [tracy.roslyn@doverbroecks.com](mailto:tracy.roslyn@doverbroecks.com).

## **DATA SECURITY**

We protect the security of your information. If you want to know how we do this, please contact Tracy Roslyn, Data Compliance Administrator, [tracy.roslyn@doverbroecks.com](mailto:tracy.roslyn@doverbroecks.com).

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those individuals who have a need to know it. They will only use your personal information on our instructions and they will be required to treat it as confidential.

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

## **FOR HOW LONG WILL YOU KEEP MY INFORMATION?**

The School will keep your personal information for as long as it is necessary. When we do not have a lawful reason to hold it, we will delete or destroy your personal information securely. Typically, we will hold your personal information for a period of up to seven years after your child leaves the School or when your child reaches the age of 25 (whichever is later). Some of your personal information will be kept for a much shorter period, e.g. CCTV images and bank account details. However, any of your personal information which relates to incident reports and safeguarding must be kept much longer, as required by the law. For further information, please see our Data Protection Policy (retention periods), available from our website.

In some circumstances we may anonymise your personal information, so that it can no longer be linked to you. If we do this, we may use such information without telling you.

## **WHAT ABOUT CHANGING THE DATA THAT WE HOLD ABOUT YOU?**

If you move house or any of your personal details change, it is important that you let us know so that the information we hold is accurate.

## **WHAT CAN I DO WITH THE PERSONAL INFORMATION THAT YOU USE?**

You have the following rights in connection with your personal information. You can:

- Ask to see your personal information
- Ask for a correction of your personal information to ensure it is accurate
- Ask for your personal information to be deleted
- Object to processing of your personal information
- Ask for us to limit the processing of your personal information
- Request the transfer of your personal information to another party.

If you want to do any of the above, please contact Tracy Roslyn, Data Compliance Administrator, [tracy.roslyn@doverbroecks.com](mailto:tracy.roslyn@doverbroecks.com) in writing.

## **RIGHT TO WITHDRAW CONSENT**

Where you have voluntarily supplied us optional personal information, you can withdraw this consent at any time. If you do wish to withdraw your consent, please contact Tracy Roslyn, Data Compliance Administrator, [tracy.roslyn@doverbroecks.com](mailto:tracy.roslyn@doverbroecks.com) in writing.

## **POINT OF CONTACT**

Tracy Roslyn (Data Compliance Administrator) is responsible for overseeing compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact her at [tracy.roslyn@doverbroecks.com](mailto:tracy.roslyn@doverbroecks.com) in writing.

If you are unhappy with how we are processing your personal information, you can make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, although the ICO recommends that you take steps to resolve the matter with the School before involving them.

## **CHANGES TO THIS PRIVACY NOTICE**

We may update this privacy notice at any time, and we will make any new privacy notice accessible to you on the School's website. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact Tracy Roslyn, Data Compliance Administrator, [tracy.roslyn@doverbroecks.com](mailto:tracy.roslyn@doverbroecks.com) in writing.**

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