



PRIVACY NOTICE FOR PUPILS

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 allowed to hold about you, and only uses it for limited purposes.

WHAT KIND OF INFORMATION DO WE COLLECT ABOUT YOU?

- Your personal information (such as your name, title, date of birth, nationality, addresses, telephone numbers, email addresses)
- Your academic, admissions and attendance records (including information about any special needs), and examination scripts and marks
- where appropriate, information about your health and welfare, and contact details for someone in case of an emergency
- references we give or receive about you, and information provided by your previous schools and professionals and organisations that have worked with you
- Copies of your official documents (such as passport, birth certificate, UKVI visa and CAS)
- Medical information (such as medication you are required to take and food allergies)
- Images of you taking part in School or other activities, and images captured by the School's CCTV system
- Any court order relating to you (if relevant).

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect personal information from you and your parents or guardians directly. This may be through a form, or simply in our day-to-day contact with you (such as emails or verbal conversations).

From time to time we may also collect information about you supplied by others. For example, we may receive information from:

- your parents
- another school
- professionals or authorities that have worked with you
- your UK guardian, and
- an agent that helped you get a place at the School.

The majority of the personal information you provide to us is mandatory, which means that you must provide it to us. 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 you can join the School (and consider whether bursaries or scholarships will apply)
2. to support your learning and education
3. to monitor and report on your progress
4. to make sure your health and wellbeing is looked after
5. to make sure we provide you with a high quality of education
6. to promote the School and its events, e.g. on the School website and via the School's social media channels
7. to share and celebrate your achievements with others, and
8. to ensure the School complies with the law and meets its legal obligations.

You can find more information about these reasons below.

THE LAWFUL BASIS FOR USING YOUR PERSONAL INFORMATION

We have promised to your parents, under a contract with them, that we will support your learning and education at the School. Most of the personal information we collect about you is needed to make sure we are able to provide this support to you under that contract. We also use your personal information to make sure that the School is acting within the law and meets its legal obligations. For example, we may need your personal information to ensure you are kept safe.

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 happen when the contract we have with your parent(s) 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 you can join the School, when we ask for professional advice from someone outside the School, and when we make use of photos of you so that we can identify you.

It is important to know that we also use some sensitive personal information about you such as your medical and health records, and religion. The School may require other information, for example, to make sure you are cared for and provide you with support to meet your specific needs. Where we collect this information, we will usually ask you for your (and/or your parent’s) clear permission to use this information.

WHO DO WE SHARE YOUR INFORMATION WITH?

We routinely share your personal information with:

1. schools and education institutions that you attend after leaving us
2. our local authority
3. the Department for Education, and
4. 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. We also routinely share your personal information (including photos) with OIEG so that they can help us promote the School and its events on our website, social media platforms and in School leaflets and brochures. We may also share your information 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 UKVI, the Charity Commission, Ofsted, professional advisers, auditors, or other regulators.

HOW SECURE IS MY INFORMATION WHEN OTHERS USE IT?

When others use your personal information we make sure that they keep it secure and we have policies that make this clear. We only allow them to use your personal information for purposes that we make clear to them in advance. They will only use your personal information in the way that we have agreed with them.

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.

INFORMATION SECURITY

We protect the security of your information. If you want to know how we do that, please contact Tracy Roslyn, Data Compliance Administrator, tracy.roslyn@doverbroecks.com.

Last updated January 2021

We have procedures to make sure that your personal information is not accidentally lost and that is not used, accessed, changed or shared with others without our permission. Your personal information will only be shared with people who need it. They will only use your personal information with clear instructions from us. We will make sure that they treat your personal information as confidential.

If your personal information is used in a way that is not acceptable, we have a procedure to deal with this. For example, if your personal information is accidentally lost we will let you know about this and we may also contact the Information Commissioner's Office about it.

FOR HOW LONG WILL YOU KEEP MY INFORMATION?

The School will keep your personal information for as long as it is necessary. When we no longer have a lawful reason to hold it, we will delete or destroy your personal information securely. You can find out more about how long we keep your personal information by taking a look at the Data Retention Policy available on our website.

In some circumstances we may anonymise your personal information. This means that your information can no longer be linked to you and you will not be identified. If we do this, we may use this information without telling you.

WHAT ABOUT CHANGING THE INFORMATION THAT WE HOLD ABOUT YOU?

If any of your personal information changes, it is important that you let us know so that we can update our records to keep it accurate.

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

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 in writing.

WHEN YOU DO NOT WANT US TO USE YOUR PERSONAL INFORMATION

Most of your personal information has to be used by us for the reasons we have given in this notice. There are certain times when we do not have to use your personal information but we think that there are good reasons why you might want us to use it. For example, we may ask for permission to use photos of you. If you give us permission to use this personal information you can always ask us to stop using your information. If you want to do this, please contact Tracy Roslyn, Data Compliance Administrator, tracy.roslyn@doverbroecks.com.

POINT OF CONTACT

Tracy Roslyn (Data Compliance Administrator) is responsible for 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 in writing.

If you are unhappy with how we are using 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. We recommend that you discuss any concerns with us first before going to the ICO.

CHANGES TO THIS PRIVACY NOTICE

We may update this privacy notice at any time and we will provide you with a new privacy notice when we make any big changes. We may also let you know in other ways about how we use your personal information.

If you have any questions about this privacy notice, please contact Tracy Roslyn, Data Compliance Administrator, tracy.roslyn@doverbroecks.com in writing.

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