



WEBSITE 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 information that we hold about you. IT explains how we use your personal data when visiting our website or speaking at the school.

We are committed to ensuring the privacy of our website visitors and external speakers. In this policy we explain how we hold, process and retain your personal data.

1. HOW WE USE YOUR PERSONAL DATA

- 1.1. **Enquiry Data.** We may process information that you provide to us through our website forms ("**Enquiry Data**"). Our website forms include the Admissions Enquiry Form, Application Form, Open Day Registration Form and Alumni Consent Form. This Enquiry Data may include your name, title, address, telephone number and email address. The legal basis for this processing is your consent.
- 1.2. **Your Child's Data.** We may process information of a child to whom you are a parent or guardian when you complete an Admissions Enquiry Form, Application Form or Open Day Registration Form ("**Your Child's Data**"). Your Child's Data may include their name, title, gender, address, telephone number, date of birth, education details, nationality, whether English is their first language and their referees' name and contact details. The legal basis for this processing is consent you give on behalf of your child.
- 1.3. **Website Data.** We may process data about your use of our website and services ("**Website Data**"). The Website Data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the Website Data is our analytics tracking system. This Website Data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 1.4. **Marketing Data.** We may process information that you provide to us when responding to questions about how you heard about us ("**Marketing Data**"). These questions are asked when you submit an application form. The legal basis for this processing is your consent.
- 1.5. **External Speakers.** We may process your personal information when you speak at events organised by the school ("**External Speaker Data**"). You may have provided us with this information specifically for the event or we may have collected it when you were a pupil at the school, or in the course of our alumni communications with you. This information may include your name, title, education, qualifications, work/career information and comments about the event or the school. We may use your information to create a personal profile which may be displayed on the school's social media, in the school's newsletter, and in its brochures. We may also display in these media any materials you

provide to us during the course of your speaking engagement. The legal basis for this processing is consent and/or legitimate interests, namely promoting the school.

- 1.6. **Cookies.** Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. Our Cookie Policy can be found here: www.doverbroecks.com/cookies.
- 1.7. **Other Processing Activities.** In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person.
- 1.8. **Sensitive Personal Data.** During the course of using our website and/or completing our website forms you may provide us with sensitive personal data ("**Sensitive Data**"). This Sensitive Data may include your nationality and any disability you may have. We may use this data to consider your eligibility to study in the UK and assess what reasonable adjustments we could make during the application process and when you join the School (if applicable). The legal basis for this processing is consent and/or compliance with the Equality Act 2010 and/or other legal obligations.

2. PROVIDING YOUR PERSONAL DATA TO OTHERS

- 2.1. **To our partner service providers.** We may also disclose your personal data to WCBS, our database supplier, and WPEngine, providers of our website hosting services, whose functions include processing of personal data for the purposes of improving our website and services for you. We may share your personal data with companies such as RSAcademics Ltd who carry out research to help us with our future planning for the School. The legal basis for this processing is our legitimate interests, namely improving our customer service and offering to prospective (and current) students. We will normally give you the opportunity to opt out of this research before any personal data is shared.
- 2.2. **Our insurers/professional advisers.** We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 2.3. **Where we provide your personal data to any third party.** Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards.
- 2.4. **To comply with legal obligations.** In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

3. TRANSFERRING YOUR PERSONAL 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.

4. RETAINING AND DELETING PERSONAL DATA

- 4.1. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.2. Unless we contact you and obtain your consent for us to retain your personal data for a longer period, we will retain and delete your personal data as follows:
 - (a) **Enquiry Data and Your Child's Data.** If your child does not attend the school, this data will be retained until your child reaches the age of 19 and it will be deleted from our systems at that point. If your child attends the school, the Enquiry Data and Your Child's Data will form part of the pupil record and will be retained in line with our Retention policy, which is available on our website.
 - (b) **Website Data** will be retained for 18 months following the date of our last contact with you, at the end of which period it will be deleted from our systems.
 - (c) **Marketing Data** will be retained for 18 months following the date you submitted the prospectus request form, at the end of which period it will be deleted from our systems.
 - (d) **External Speaker Data** will be retained for 18 months following the date you spoke at our event.
- 4.3. We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person.

5. AMENDMENTS

- 5.1. We may update this notice from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this notice.

6. YOUR RIGHTS

- 6.1. **Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.
- 6.2. **Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.
- 6.3. **Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay.

- 6.4. **Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted.
- 6.5. **Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only when we are relying on certain legal bases to process your personal data.
- 6.6. **Your right to object to direct marketing.** You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.
- 6.7. **Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 6.8. **Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7. OUR DETAILS

- 7.1. This website is owned and operated by d'Overbroeck's.
- 7.2. We are a registered company in England and Wales under registration number 01501239, and our registered address is at New Kings Court Tollgate, Chandler's Ford, Eastleigh, Hampshire SO53 3LG.

8. DATA COMPLIANCE ADMINISTRATOR

- 8.1. Tracy Roslyn, the school's 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.

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