



Privacy Notice – Website Users

1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school (which is part of the Nene Education Trust) uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store, and use personal data about individuals visiting and using one of our school or Trust websites. We are committed to safeguarding the privacy of our website visitors. This notice applies where we are acting as a data controller with respect to the personal data of our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.

We use cookies on our website. In so far as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.

Our Trust is the 'data controller' for the purposes of UK data protection law.

Nene Education Trust
Waterside House
Station Road
Irthlingborough
NN9 5QF
Tel: 01933 627081

Our Data Protection Officer is:

Angela Corbyn
Email: dpo@neneeducationtrust.org.uk
Tel: 07775 436141

2. How we use your personal data

In this section we have set out:

- the general categories of personal data that we may process;
- the purposes for which we may process personal data; and
- the legal bases of the processing.

We may process data about your use of our website ("usage data"). The usage 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 usage data is our embedded analytics tracking system. This usage data may be processed for the purposes of analysing the use of the

website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website.

We may process information contained in any enquiry which you submit to us regarding our offering ("contact us data"). The enquiry data may be processed for the purposes of offering relevant responses to you. The legal basis for this processing is consent.

We may process any of your personal data identified in this policy where necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights, and the legal rights of others.

Please do not supply any other person's personal data to us unless we prompt you to do so.

2.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting Trust/school events, campaigns, charitable causes, or services that you might be interested in.

You can take back this consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting the Trust/school office.

2.2 Use of your personal data in automated decision making and profiling

We do not currently process any of your personal data through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

3. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed above are as follows: We have obtained consent to use it in a certain way.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4. Collecting this data

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

5. How we store this data

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

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. We will retain your personal data as follows:

- Usage data will be retained for a minimum period of 1 day following the date of collection, and for a maximum period of 12 months following that date;
- Contact us data will be retained for a minimum period of 1 working day following the date of the enquiry, and for a maximum period of 1 month following that date;

Notwithstanding the other provisions, 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 natural person.

6. Who we share data with

We will not disclose your personal data to any third party.

Your personal data held in our website database will be stored on the servers of our hosting services providers.

In addition to the specific disclosures of personal data set out, we may disclose your personal data where such disclosure 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 natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6.1 Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

7. About cookies

When you first visit our website, we will ask you to consent to the use of cookies in accordance with the terms of this policy. If you give consent, then cookies will be delivered and stored on your device. To do this, you should click the "I Agree" button. You can manage your preferences by using the "Manage Cookies" button.

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to your web browser and is stored by your web browser. The next time (and subsequent times) that you visit the website, the PC checks to see if it has a cookie which relates to the website and, if the cookie is present, it is then sent back to the server. The server then recognizes the connection as one that has been made on an earlier occasion and can provide relevant information based on the content of the cookie. It is the website's way to ask you, automatically, 'have you been here before'; if you have, then the server will act accordingly.

Cookies may be either "persistent" cookies or "session" cookies and all cookies have an expiry date and time feature.

Persistent cookies will be stored by your web browser and will remain on your device (computer) until the cookie's expiry date, unless the cookie is deleted by you before the expiry date.

A session cookie, on the other hand, will be stored by your web browser and will expire at the end of your session, such as when you log out of the website or when the web browser is closed.

Cookies do not typically contain any information that personally identifies you, but other personal information that we store about you may be linked to the information stored in and obtained from cookies. That said, Nene Education Trust do not perform such links.

Cookies can be used by third party web servers to identify and track you and other users as you/they navigate the different pages on a website and can then identify users returning to a website. This is an automated process.

We use both session and persistent cookies on our website.

As noted above we use persistent cookies for general access to the website, when visiting standard pages.

We use session cookies for you if (and only if) you log into our website to gain access to more secure information that is not available to the general public. By log in, we mean that you will enter a username and password that is unique to you. These cookies are only valid during your logged in session and are removed once you log out. Only Administrators perform this task.

The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

- The cookies on this website are disabled
- This decision can be reversed anytime by clicking the below button "Allow Cookies"

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (unless there's a really good reason why we shouldn't):

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data (decisions made by a computer or machine, rather than by a person), and any consequences of this
- Give you a copy of the information in an understandable form

You may also have the right for your personal information to be shared with another organisation in certain circumstances. If you would like to make a request, please contact the Data Protection Officer via contact details provided on page 1.

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

- Say that you don't want your personal information to be used
- Stop it being used to send you marketing materials
- Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation if the data protection rules are broken and this harms you in some way

9. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concerns about our data processing, please let us know first.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at: <https://ico.org.uk/make-a-complaint/>
- Call: 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions or concerns, or would like more information, please contact our Data Protection Officer:

Angela Corbyn
Email: dpo@neneeducationtrust.org.uk
Tel: 07775 436141

Or our Trust GDPR Lead for general GDPR queries:

Victoria Brennan
Email: vbrennan@neneeducationtrust.org.uk
Tel: 01933 400549