

INTRODUCTION

Welcome to Windlesham House School's privacy notice. This privacy notice applies to anyone visiting the Windlesham House School website www.windlesham.com. Windlesham House 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. Please refer to the Glossary for definitions of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

(a) Purpose of this Privacy Notice

This privacy notice aims to give you information on how Windlesham House 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 it is not intended to override them.

This privacy notice also applies in addition to Windlesham House School's other relevant terms and conditions including:

- Any contract between Windlesham House School and its staff or the parents of pupils
- The school's policy on taking, storing and using images of children;
- The school's CCTV policy
- Windlesham House School's retention of records policy
- The school's safeguarding, pastoral or health and safety policies, including as to how concerns or incidents are recorded and
- Windlesham House School's IT policies

Data protection law requires Windlesham House School, a 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 kept up to date
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told
- To ensure that appropriate security measures are used to protect your data

(b) Controller

Windlesham House School is the controller and responsible for your personal data (referred to as Windlesham House School, “we”, “us”, or “our” in this privacy notice).

We have appointed a privacy manager 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 Data Protection Manager (DPM) using the details set out below.

(c) Contact Details

Our full details are:

Full name of legal entity:	The Malden Trust Limited trading as Windlesham House School
Name or title of data privacy manager:	Emma Harris
Email address:	eharis@windlesham.com
Postal Address:	London Road, Washington, Pulborough, West Sussex, RH20 4AY
Telephone Number:	01903 874705

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

(d) Changes to the Privacy Notice and Your Duty to Inform Us of Changes

This version was last updated on 18 May 2021 and historic version can be obtained by contacting us. We may need to update this notice from time to time. If the change is material, we will give you not less than two months’ notice of the change so that you can exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by contacting you at the details you have provided to us in your last correspondence.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to the 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 data privacy manager of any changes in your data at the following email address: WHSoffice@windlesham.com

(e) 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 are organisations connected with us (such as the Owls, Alumni and other school associations) 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.

2. 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 data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and photographs.
- Contact Data includes postal address, email address and telephone numbers
- Professional Data includes academic qualifications and achievements, references profession, job title, employer and professional history of the same.
- Welfare Data includes grievance and disciplinary information, pastoral care records, past, present and prospective students' academic, admissions and attendance records, (including information about special needs), examination scripts and marks, information relating to criminal convictions and allegations or 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 transactions you have entered with 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 Windlesham House School online service, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website and services
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We refer to the above categories of data in the data subject category tables below.

We also collect and use 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 our Professional Data to calculate the percentage of student who go into a sector or industry. 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 may 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 (such as when carrying out DBS checks). 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.

(a) If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract that 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, if you want to register your child as a pupil). We will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED

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

(i) Direct Interactions

You may give us your Identity, Contact and Financial Data by filling in forms (including in the case of pupils or prospective pupils by parents providing data by filling in forms in relation to pupils) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply to enrol your child as a prospective pupil with us
- Enrol your child with us
- Make a donation to Windlesham House School
- Request access to our library
- Keep in touch with our Development Office
- Make a payment to us for events or services
- Sign up as an Owls Alumni with us or
- Give us some feedback

(ii) 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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

(iii) Third Parties or Publicly Available Sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google based outside the UK
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity, Professional, Contact, Technical, Usage and Profile Data submitted by way of applications to Windlesham House School

- Professional Data from your previous educational establishments and/or employers if they provide references to Windlesham House School
- Identity and Contact Data from pupils at Windlesham House School, family members, friends, visitors to Windlesham House School and other contacts who may provide us with information about you.
- Identify and Contract Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. 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.

[Click here](#) to find out more about the types of lawful basis that we 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 certain special categories of (sensitive) personal data. You have the right to withdraw consent to marketing at any time by [contacting us](#)

(a) Purposes for Which We Will Use Your Personal Data

We have set out, 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. Please click on the category relevant to you for more information.

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.

(b) 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 may have to share your personal data for the purposes set out in the table at (d) and with the parties set out below:

- External Third Parties as set out in the Glossary

- Third parties to whom we may choose to sell, transfer or merge parts of our school or our assets. Alternatively, we may seek to acquire other schools or merge with them. If a change happens to our school, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and 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.

(c) International Transfers

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, save as when an exception applies, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed in the UK to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

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

(d) Purpose, Data Type and Lawful Basis for Processing

PUPILS

If you are a pupil, applicant or visiting pupil to Windlesham House School, this section will be relevant to you.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To consider your application to enrol as a pupil	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial	<ul style="list-style-type: none">• Performance of the pupil contract
To enrol you as a pupil	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial	<ul style="list-style-type: none">• Performance of the pupil contract
To deliver teaching services to you	(a) Identity (b) Contact (c) Financial (d) Technical (e) Profile (f) Usage	<ul style="list-style-type: none">• Performance of the pupil contract
To provide you with accommodation	(a) Identity (b) Contact (c) Profile (d) Welfare (e) Financial (f) Transaction	<ul style="list-style-type: none">• Performance of a contract with you

To provide you with catering	(a) Identity (b) Contact (c) Welfare (d) Financial (e) Transaction	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (ensuring that you have an appropriate service on an ongoing basis)
To protect you and ensure your health, safety and welfare during your enrolment with us	(a) Identity (b) Contact (c) Welfare	<ul style="list-style-type: none"> • Necessary for our legitimate interests (in ensuring the safety of our students, staff and visitors)
To deliver digital resources to you for your academic and domestic requirements	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (we have a legitimate interest in the proper management of IT resources)
To use data analytics to improve our website, services, marketing, student relationships and experiences	(a) Technical (b) Usage (c) Profile (d) Marketing and Communications	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Consent
To manage our relationship with you which will include notifying you about changes to our terms, policies and procedures	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation

EMPLOYEES

If you are an employee, volunteer of applicant to Windlesham House School, this section will be relevant to you. This notice does not form part of any contract of employment.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To engage you as our employee	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial	<ul style="list-style-type: none"> • Performance of the employment contract • Necessary to comply with a legal obligation • Necessary for our legitimate interests – processing Welfare Data to carry out a DBS check is necessary for the protection of the public; processing identity and Welfare Data for equality monitoring purposes is necessary for us to promote and maintain equality
To manage our relationship with you which will include: (a) To pay salary, expenses, PAYE, pension contributions (b) To manage grievance, disciplinary and capability matters (c) To ensure health and safety (d) Notifying you about changes to our policies and procedures	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial	<ul style="list-style-type: none"> • Performance of the employment contract and any other contracts you may enter into with Windlesham House School • Necessary to comply with a legal obligation. Necessary for our legitimate interests in respect of: <ul style="list-style-type: none"> ○ Health and Safety management ○ Catering services to ensure that you receive appropriate service on an ongoing basis ○ Pension contributions to enable the pension provider to operate the pension in accordance with the scheme and your and their respective rights and obligations ○ Your attendance at meetings, we have a legitimate interest in compiling a record of administrative and managerial matters ○ Conflict of interest declarations, we have a legitimate interest in understanding when your interests conflict with those of Windlesham House School and when you will be unable to contribute to management and/or decisions

<p>(e) To provide you with appropriate resources such as library access</p> <p>(f) Providing you with catering</p> <p>(g) Detailing your attendance at and participation in Windlesham House School administrative meetings.</p> <p>(h) Processing conflict of interest declarations.</p> <p>(i) To manage your absence records (including holiday, sickness records, sabbatical entitlement and other absences)</p> <p>(j) To manage leave requests</p>		<ul style="list-style-type: none"> ○ Professional Data, we have a legitimate interests in holding an up to date record of your learning and development achievements for workforce planning and recognition ○ Welfare Data as we have a legitimate interest in the proper investigation and handling of relevant complaints, disputes and grievances ○ Absence records as we have a legitimate interest in monitoring and managing the availability of employees.
<p>To administer and protect Windlesham House School and this website and other digital resources (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<ul style="list-style-type: none"> ● Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security and to prevent fraud) ● Necessary to comply with a legal obligation
<p>To use data analytics to comply with regulatory requirements, improve our website, services,</p>	<p>(a) Technical (b) Usage</p>	<ul style="list-style-type: none"> ● Necessary to comply with a legal obligation ● Necessary for our legitimate interests (to keep our website updated and relevant, to develop our facilities and to inform our employee engagement strategies)

marketing, staff relationships and experiences		
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ALUMNI

If you are an alumnus of Windlesham House School, this section will be relevant to you

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as an alumnus	(a) Identity (b) Contact	<ul style="list-style-type: none"> Necessary for our legitimate interests (to deliver information about your alumni services) Performance of the Owls Alumni contract you may enter into with Windlesham House School
To enable you to partake in alumni and Windlesham House events and make suggestions and recommendations to you about events that may be of interest to you	(a) Identity (b) Contact (c) Professional (d) Financial (e) Transaction (f) Marketing and Communications	<ul style="list-style-type: none"> Performance of the Owls Alumni contract you may enter into with Windlesham House School Consent (in relation to your e-marketing preferences) Necessary for our legitimate interests (to deliver you information about our activities for your possible participation)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<ul style="list-style-type: none"> Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to show how alumni use our services)

(b) Asking you to leave a review of take a survey		
To facilitate our fundraising programmes and enable you to make donations	(a) Identity (b) Contact (c) Professional (d) Financial (e) Transaction (f) Marketing and Communications	<ul style="list-style-type: none"> • Performance of a Contract • Necessary for our legitimate interests (to fundraise and notify you of fundraising activities that are relevant to you)
To administer and protect Windlesham House School and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security and to prevent fraud) • Necessary to comply with a legal obligation
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define categories of alumni for our events and services, to keep our website updated and relevant, to develop our organisation and to inform our marketing and communications strategy)
To maintain a record of alumni achievements and life events	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial (f) Transaction (g) Profile (h) Marketing and Communications	<ul style="list-style-type: none"> • Archiving (in relation to special categories of (sensitive) data that might be contained in our records pursuant to above activities)

PARENTS/NEXT OF KIN

If you are a parent, carer or guardian, emergency contact or next of kin to a pupil or employee at Windlesham House School, this section will be relevant to you.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Processing payments for fees and extras</p> <p>(c) Retaining emergency contact details in case of emergency</p>	<p>(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction</p>	<ul style="list-style-type: none"> • Performance of a contract • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how parents/next of kin use our services)
<p>To enable you to partake in school events and make suggestions and recommendations to you about events that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Welfare</p>	<ul style="list-style-type: none"> • Consent (in relation to your e-marketing preferences) • Necessary for our legitimate interests (to deliver you information about our activities for your possible participation)
<p>To administer and protect Windlesham House School and this website (including troubleshooting, data, analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security and to prevent fraud). • Necessary to comply with a legal obligation
<p>To use data analytics to improve our website, services, marketing, relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to keep our website updated and relevant, to develop our organisation and to inform our marketing and communications strategy)

SUPPLIERS

If you are a supplier to Windlesham House School, this section will be relevant to you. This notice does not form part of any contract to provide services.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a supplier	(a) Identity (b) Contact	<ul style="list-style-type: none"> • Performance of a contract
To process and deliver orders for service including to manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	<ul style="list-style-type: none"> • Performance of a contract
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how we use supplier services)
To administer and protect Windlesham House School and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security and to prevent fraud) • Necessary to comply with a legal obligation

DONORS

If you are a donor of monies or archive material to Windlesham House School, this section will be relevant to you.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To record you as a donor	(a) Identity (b) Contact	<ul style="list-style-type: none"> • Performance of a contract • Necessary for our legitimate interests (to record the source of donations for administration and to develop our archive and fundraising strategies)
To process your donation including to collect donations pledged to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	<ul style="list-style-type: none"> • Performance of a contract • Necessary to comply with a legal obligation
To manage our relationship with you which will include notifying you about changes to our terms, policies and procedures including our privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<ul style="list-style-type: none"> • Performance of a contract • Necessary to comply with a legal obligation
To administer and protect Windlesham House School and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security and to prevent fraud) • Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve you	(a) Identity (b) Contact (c) Profile (d) Usage	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to study how donors interact with us, to develop our relationship with donors, to grow our organisation and to inform our archiving and fundraising strategy)

	(e) Marketing and Communications (f) Technical	
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	<ul style="list-style-type: none"> Necessary for our legitimate interests (to define types of donor for our, to keep our website updated and relevant, to develop our organisation and to inform our archiving and fundraising strategy)
To make suggestions and recommendations to you about events or fundraising efforts that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	<ul style="list-style-type: none"> Necessary for our legitimate interests (to develop our organisation)

GENERAL PUBLIC

If you are a member of the general public or a visitor who accesses our services or facilities, this section will be relevant to you

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register where you seek to access our facilities or attend an event	(a) Identity (b) Contact	<ul style="list-style-type: none"> • Performance of a contract
To deliver services, events or access to you including: <ul style="list-style-type: none"> (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Providing catering 	(a) Identity (b) Contact (c) Welfare (d) Financial (e) Transaction (f) Marketing and Communications	<ul style="list-style-type: none"> • Performance of a contract • Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation
To ensure safety and security at our premises	(a) Identity (b) Contact	<ul style="list-style-type: none"> • Necessary for our legitimate interests (in ensuring the safety and security of individuals and our assets on our premises)
To administer and protect Windlesham House School and this website (including troubleshooting, data analysis, testing, system maintenance,	(a) Identity (b) Contact (c) Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security and to prevent fraud) • Necessary to comply with a legal obligation

support, reporting and hosting of data)		
To deliver relevant website content and marketing delivered to you and measure or understand the effectiveness of the marketing we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	<ul style="list-style-type: none"> Necessary for our legitimate interests (to understand how our visitors use our services and facilities, to develop them and to develop our organisation)
To use data analytics to improve our website, services, marketing, public relationships and experiences	(a) Technical (b) Usage	<ul style="list-style-type: none"> Necessary for our legitimate interests (to define types of users of our events and services, to keep our website updated and relevant, to develop our organisation)
To make suggestions and recommendations to you about events or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	<ul style="list-style-type: none"> Necessary for our legitimate interest (to develop our events and services)

(e) Marketing

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

Marketing Communications 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 events, services and activities 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 organisation outside Windlesham House School for marketing purposes. We don't anticipate sharing your personal data with third parties for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by whsoffice@windlesham.com.

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 and services.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set our 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 [click here](#).

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.

5. DATA SECURITY

We have 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.

6. DATA RETENTION

(a) 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 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.

By law we are required to keep Welfare Data on students for 25 years for safeguarding 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.

7. 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.

(a) 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 and we will notify you if this is the case.

(b) 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.

(c) 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.

8. GLOSSARY

Lawful Basis

Legitimate Interest means the interest of our organisation in conducting and managing our organisation to enable us to give you the best service 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 or agreement 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

Third Parties

External Third Parties

- Service providers acting as processors based in the United Kingdom who provide employee related IT services in relation to pension provision, insurance, and other services. MailChimp for some email communications, iSAMs a database which holds pupil and parent details and prospects and MyConcern, a pastoral care database.
- Service providers acting as processors based in the United States who provide IT and system administration services such as Google, Microsoft and Survey Monkey;
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- Department for Education, HM Revenue & Customs, regulators (e.g. the Independent Schools Inspectorate, the Health & Safety Executive, the Information Commissioner) and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Government or educational authorities and educational institutions based outside of the United Kingdom with whom we may share or from whom we may receive personal data for pupil VISA, application and enrolment purposes.

Your legal rights

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.