

## 1. INTRODUCTION

This policy is intended to provide information about how the school will use (or 'process') personal data about individuals including its staff; its current, past and prospective pupils; and their parents, carers or guardians. Collectively we refer to these individuals in the Privacy Notice as the school's community.

This information is provided because Data Protection legislation gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the school's obligations to its entire community.

This Privacy Notice applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the school's other relevant terms and conditions and policies, including:

- Any contract between the 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 and/or biometrics policy;
- The 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
- The school's IT policies, including its Safe Use of Technology policy for both staff and pupils.

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, Governors and service providers) should also be aware of and comply with this Privacy Notice which also provides further information about how personal data about those individuals will be used.

### Responsibility for Data Protection

The Data Controller is Tudor Hall School at Wykham Park Banbury, Oxfordshire OX16 9UR and is registered with the ICO, registration number Z5684667.

The school has appointed the Bursar as Data Protection Lead, who will deal with all your requests and enquiries concerning the school's use of your personal data, and endeavours to ensure that all personal data is processed in compliance with this policy and Data Protection law.

The Bursar can be contacted at: [bursar@tudorhallschool.com](mailto:bursar@tudorhallschool.com)

### 1. INTRODUCTION

- 1.1 Tudor Hall School is committed to keeping your data safe. This notice is to help you understand how and why we collect personal information about you and your child, who is a pupil at Tudor and what we do with that information. It also explains the decisions that you can make about your own information.
- 1.2 If you have any questions about this notice please contact the Bursar [bursar@tudorhallschool.com](mailto:bursar@tudorhallschool.com)

### 2. PERSONAL INFORMATION

- 2.1 Personal information is information that identifies you as an individual and relates to you or your child.
- 2.2 This includes but not limited to your contact details, next of kin and financial information. We may also hold sensitive information such as your health data or religion. CCTV, photos and video recordings of you are also personal information. For further details see our Data Protection Policy.

#### **How and why does the School collect and use personal information?**

- 2.3 We set out below examples of the different ways in which we use personal information and where this personal information comes from. The School's primary reason for using your personal information is to provide educational services. The School is also required to hold personal data for its employees and governors.
  - 2.3.1 We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local authorities.
  - 2.3.2 We may have information about any family circumstances which might affect your child's welfare or happiness.
  - 2.3.3 We may need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the School.
  - 2.3.4 We may use CCTV to make sure the school site is safe. CCTV is not used in private areas such as toilets.
  - 2.3.5 Unless you have declined permission, we may take photographs or videos of you at School events to use on social media and on the School website. This is to show prospective parents and pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.
  - 2.3.6 We may send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter.
  - 2.3.7 We may keep details of your address when your child leaves the School, so we can send you school publications, event invitations and find out how your child is progressing. We may also pass your details onto our alumnae association, for which we have a separate privacy notice.

- 2.3.8 We may use information about you if we need this for historical research purposes or for statistical purposes.

### 3. FINANCIAL INFORMATION

- 3.1 We will process financial information about you in relation to the payment of fees. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s). We may hold information about bankruptcy petitions and statutory demands.
- 3.2 We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees. The credit reference agency will keep a record of that search and details about your application. This record will be seen by other organisations which make searches about you.
- 3.3 Failure to supply information may result in a refusal of an award or credit.

### 4. SHARING PERSONAL INFORMATION WITH THIRD PARTIES

- 4.1 In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example where we have any safeguarding concerns. On occasion, we may need to share information with the police.
- 4.2 If your child has special dietary requirements we will share this information with our catering partners.
- 4.3 We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- 4.4 Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your information with them if this is relevant to their work.
- 4.5 If your child is not of British nationality we have to make sure that your child has the right to study in the UK. We might have to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor.
- 4.6 We may share some information with our insurance company, for example, where there is a serious incident at the School.
- 4.7 If you have unpaid fees while your child is at the School we may share information about this with other schools or educational establishments to which you intend to send your child. We may also need to share this data with debt collection agencies.
- 4.8 If your child leaves us to attend another school we may need to provide that school with information about you. For example, details of family circumstances for safeguarding reasons.

#### **Special categories of personal data**

- 4.9 The School must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation. The additional condition includes:

- 4.9.1 **Substantial public interest** - The processing is necessary for reasons of substantial public interest.
- 4.9.2 **Vital interests** - To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.
- 4.9.3 **Legal claims** - The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.
- 4.9.4 **Medical purposes** - This includes medical treatment and the management of healthcare services.
- 4.9.5 **Consent** - We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact the Bursar if you would like to withdraw any consent given.

### **Sending information to other countries**

- 4.10 We may send your information to other countries where:
  - 4.10.1 We store information on computer servers based overseas.
  - 4.10.2 We communicate with you when you or your child are overseas. (for example, during the holidays if you live in a different country)
- 4.11 The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index\\_en.html](http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.html)
- 4.12 If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is the UK. The School will only use processors to store data in such countries if adequate and GDPR compliant measures are in place.

### **For how long do we keep your information?**

- 4.13 We keep your information for as long as we need to in order to educate and look after your child or to fulfil our duties as your employer. We will keep some information after your child has left the School, for example, so that we can find out what happened if you make a complaint.
- 4.14 We will also keep your information in order to maintain contact with you as part of the wider school community which includes old girls, their parents, former staff and governors.
- 4.15 In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.
- 4.16 We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

## **What decisions can you make about your information?**

- 4.17 From May 2018 data protection legislation gives you a number of rights regarding your information:
- 4.17.1 If information is incorrect you can ask us to correct it;
  - 4.17.2 You can also ask what information we hold about you and be provided with a copy. This is known as a Subject Access Request (SAR). We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to. If you request a SAR we have one calendar month to provide you with the information providing the request is reasonable and proportionate;
  - 4.17.3 You can ask us to delete the information that we hold about you in certain circumstances, for example, where we no longer need the information;
  - 4.17.4 You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer.
- 4.18 Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

## **5. FURTHER INFORMATION AND GUIDANCE**

- 5.1 The Bursar is the person responsible at school for managing how we look after personal information and deciding how it is shared.
- 5.2 Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and, most importantly, treat the information we get fairly.
- 5.3 This notice is to explain how we use your personal information. The Bursar can answer any questions which you may have.
- 5.4 Please speak to the Bursar if:
- 5.4.1 You object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to;
  - 5.4.2 You would like us to update the information we hold about you; and
  - 5.4.3 You would prefer that certain information is kept confidential.
- 5.5 If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - [ico.org.uk](http://ico.org.uk).
- 5.6 The Data Controller is Tudor Hall School at Wykham Park Banbury, Oxfordshire OX16 9UR and is registered with the ICO, registration number Z5684667.

Reviewed by Bursar: January 2025

Reviewed by Bursar: November 2019

## APPENDIX 2 - PRIVACY NOTICE - EMPLOYEES

### 1. INTRODUCTION

- 1.1 We are committed to protecting the privacy and security of your personal information. For the purposes of the '*General Data Protection Regulation*' (GDPR) and the '*Data Protection Act*' 2018 (DPA2018), we are the data controller and our address is Tudor Hall School, Wykham Park Banbury, Oxfordshire OX16 9UR. As data controller we are responsible for deciding how we hold and use personal information about you.
- 1.2 We also have a [Data Protection Policy](#) which we ask you to read carefully. It sets out your responsibilities to follow good data protection standards and behavior, whereas this notice informs you about how we collect and use personal information about you during and after your working relationship with us, in accordance with GDPR.
- 1.3 This notice applies to current and former employees, including governors, workers and contractors of the school. This notice does not form part of any contract of employment or other contract to provide services.
- 1.4 We may update this notice at any time.

### 2. INFORMATION HELD

- 2.1 **Personal data** - We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers
- Personal email addresses;
- Date of birth;
- Gender;
- Marital status and dependants;
- Next of kin and emergency contact information; national insurance number;
- Bank account details,
- Payroll records and tax status information;
- Salary, annual leave, pension and benefits information;
- Start date;
- Location of employment or workplace;
- Copy of driving licence and/or passport;
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- Employment records (including job titles, qualifications, work history, working hours, training records and professional memberships);
- Compensation history;
- Performance information;
- Disciplinary and grievance information;
- CCTV footage and other information obtained through electronic means such as swipecard records;
- Information about your use of our information and communications systems; and
- Photographs.

- 2.2 **Sensitive Personal Data** - We may also collect, store and use the following sensitive (or special categories of) personal data about you including your:

- Race or ethnicity;
- Religious or philosophical beliefs;
- Political opinions;

- Trade union membership;
- Sexual orientation;
- Biometric or genetic data;
- Physical or mental health, including any medical condition, health and sickness records; and
- Criminal convictions and offences.

2.3 **How is your personal information collected?** - We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

2.4 We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

2.5 We may also use CCTV footage to ensure your workplace is safe.

### 3. HOW WE WILL USE INFORMATION ABOUT YOU?

3.1 **Lawful bases of processing** - We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where:

- 3.1.1 We need to perform the contract we have entered into with you; we need to comply with a legal obligation;
- 3.1.2 It is necessary for our legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests; and
- 3.1.3 It is necessary for the purposes of carrying out our obligations in the field of employment law.

3.2 We may also use your personal information in the following situations, which are likely to be rare:

- 3.2.1 where we need to protect your interests, or someone else's interests, (for example, we may need to use your details without telling you to deal with a medical emergency); or
- 3.2.2 where it is needed in the public interest or for official purposes.

### 3.3 **Situations in which we will use your personal information**

3.4 We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment;
- Determining the terms on which you work for us;
- Checking you are legally entitled to work in the UK;
- Conducting checks through the appropriate government department to ensure that you are able to teach in accordance with the terms of the employment contract and that you hold either Qualified Teacher Status or Qualified Teacher Learning and Skills Status;

- Conducting prohibition from teaching or management checks and/or any other checks or measures that we are required to undertake as a result of any child protection legislation from time to time in force;
- Paying you and, if you are an employee, deducting tax and national insurance contributions; providing you with the benefits as set out in the employment contract or elsewhere;
- Liaising with your pension provider;
- Administering the contract we have entered into with you;
- Business management and planning, including accounting and auditing;
- Conducting performance reviews, managing performance and determining performance requirements;
- Making decisions about salary reviews and compensation;
- Assessing qualifications for a particular job or task, including decisions about promotions;
- Gathering evidence for possible grievance or disciplinary hearings;
- Making decisions about your continued employment or engagement;
- Making arrangements for the termination of our working relationship; education, training and development requirements;
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- Ascertaining your fitness to work; managing sickness absence;
- Complying with health and safety obligations;
- To prevent fraud;
- To monitor your use of our information and communication systems to ensure compliance with our IT policies;
- To send out surveys to you about your experience during employment with us;
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- and equal opportunities monitoring.

3.5 Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

3.6 **How we use sensitive personal information** - We may process special categories of personal information in the following circumstances:

- 3.6.1 In limited circumstances, with your explicit written consent;
- 3.6.2 Where we need to carry out our legal obligations and in line with our [Data Protection Policy](#);
- 3.6.3 Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our [Data Protection Policy](#); and
- 3.6.4 Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

3.7 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests, or someone else's interests, and you are not capable of giving your consent, or where you have already made the information public.



3.8 We will use your sensitive personal information in the following ways:

- In relation to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
- About your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits;
- About your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

3.9 **Do we need your consent?**

- 3.9.1 We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law.
- 3.9.2 In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data.
- 3.9.3 If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.
- 3.9.4 You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

3.10 **Information about criminal convictions** - We may only use information relating to criminal convictions where the law allows us to do so.

- 3.10.1 This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our [Data Protection Policy](#). In particular, we require information about criminal convictions as part of our safer recruitment programme.
- 3.10.2 Given that the vast majority of our employees will be working with children at some point (and the frequency in which you will be working with children depends on your role at the school), it is important that we are more vigorous in carrying out our criminal checks than organisations in other sectors. Our primary focus is on the welfare of our pupils.
- 3.10.3 Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests, or someone else's interests, and you are not capable of giving your consent, or where you have already made the information public.
- 3.10.4 We will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us or when you tell us a part of the recruitment process. We will use information about criminal convictions and offences in the following ways:

- As part of our safer recruitment programme and as part of our deciding whether you are suitable for the role;
- Where it is necessary to take the information into consideration when a complaint is made against you; and
- Taking disciplinary action against you.

3.10.5 We are allowed to use your personal information in this way to carry out our legal obligations in connection with employment and social protection law.

### 3.11 **Change of purpose**

3.11.1 We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.*

### 3.12 **If you fail to provide personal information**

3.12.1 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

### 3.13 **Data sharing**

3.13.1 We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. Third parties include third-party service providers: pension administration, pay roll, benefits provision, administration; and IT services.

3.13.2 All our third-party service providers are required 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 permit them to process your personal data for specified purposes and in accordance with our instruction.

3.13.3 We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### 3.14 **Sending information to other countries**

3.14.1 We may send your information to other countries where we or a third party store information on computer servers based overseas. The European Commission has produced a list of countries which have adequate data protection rules.

3.14.2 If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union,

Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is the UK. The School will only use processors to store data in such countries if adequate and GDPR compliant measures are in place.

3.15 **Data Security** - We have put in place measures to protect the security of your information. Details of these measures are in our GDPR Audit, which is available upon request.

3.16 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

3.17 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 employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

3.17.1 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.

3.18 **How long will you use my information for?**

3.18.1 We will only retain your personal information 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. Details of retention periods for different aspects of your personal information are available in our Retention of Records protocol.

3.18.2 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.

3.18.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our Retention of Records protocol.

3.19 **Rights of access, correction, erasure, and restriction**

3.19.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

3.20 Under certain circumstances, by law you have the right to:

3.20.1 **Request access** to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

3.20.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

3.20.3 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

3.20.4 **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

3.20.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

3.20.6 **Request the transfer** of your personal information to another party.

3.21 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Bursar, who is responsible for data processing.

3.22 **What we may need from you**

3.23 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

3.24 **Right to withdraw consent**

3.25 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 4. FURTHER INFORMATION AND GUIDANCE

4.1 The Bursar is the person responsible at our school for managing how we look after personal information and deciding how it is shared. Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and, most importantly, treat the information we get fairly.

4.2 This notice is to explain how we use your personal information. The Bursar can answer any questions which you may have. Please speak to the Bursar if:

- You object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to; or
- You would like us to update the information we hold about you;

- Or you would prefer that certain information is kept confidential.
- If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - [ico.org.uk](https://ico.org.uk).

4.3 The Data Controller is Tudor Hall School at Wykham Park Banbury, Oxfordshire OX16 9UR and is registered with the ICO, registration number Z5684667.

Reviewed by Bursar: January 2025

Reviewed by Bursar: November 2019



### 1. INTRODUCTION

- 1.1 We are proud of Tudor Hall, and the Tudor community and we want to stay in touch. However, we respect your privacy and are committed to protecting your personal information and being transparent about what information we hold and why.
- 1.2 This document outlines how the Development and Alumnae Relations Office at Tudor handles and uses the data it collects and holds on past and present pupils, parents and staff as well as current and potential supporters. This document should be read in conjunction with the School's Privacy Notice for Parents and Students, and the Data Protection Policy.

### 2. HOW THE SCHOOL USES YOUR DATA

- 2.1 Generally, the Development Office uses your data in order to keep in touch with you as members of the Tudor community, to keep you apprised of our activities and developments, to provide services to you, and to identify ways in which you can support us, through financial and non-financial means.
- 2.2 Activity includes:
  - Invitations to Old Tudorian Association (OTA) and school events
  - The production and circulation of publications (printed and digital) and surveys
  - Promotion of the aims, ideals and interests of the School
  - Appeals and requests for donations, including research on whether particular activities and appeals may be of interest to you, and your capacity to support them
- 2.3 Communications may be sent by post, telephone or by email, depending on the contact details we hold and, if applicable, the preferences expressed by you about the types of communications you wish to receive. We may also place some articles on our website or social media pages.
- 2.4 You can change your communication preferences at any time by contacting [OTA@tudorhallschool.com](mailto:OTA@tudorhallschool.com)

### 3. WHAT DATA IS HELD BY THE SCHOOL

- 3.1 The School hosts and maintains a database on behalf of the Development Office and OTA. In the case of recent leavers (OTs up to the age of 25) the School also maintains other paper and electronic records.
- 3.2 Most records usually contain:
  - Details of your school, college and university education including interests and positions held while at Tudor
  - Unique personal identifiers (names and date of birth)
  - Your contact details
- 3.3 We also record:
  - Your invitations to and attendance at School and OTA events
  - Other contact with the School or the OTA
  - Your family links with other Tudorians or supporters of the School
  - Your career and other life achievements

- Donations to the School made by you or associated with you
- Information about your areas of personal interest
- Personal data provided by you for a specific purpose or purposes (for example, catering preferences, or disability for event management)
- Your communications preferences (where provided)
- A photo if you have stored one as part of your on-line profile via the alumnae website

#### 4. INFORMATION REGARDING YOUR DATA

- 4.1 **How we collect data** - We may hold information relating to you from a number of sources. A significant proportion of the information we hold on alumnae and friends is that which you provide us (e.g. when you join the OTA, by completing forms, via the alumnae website or by corresponding with us). For alumnae, some data will be transferred from your pupil record to our database.
- 4.2 Where data is included from sources external to the School we only use data from reputable sources (including LinkedIn details published by you, family members, honours lists and publications to which you have contributed).
- 4.3 **Security and data sharing** - We will respect your personal data and keep it safe.
- 4.4 We ensure that there are appropriate technical controls in place to protect your personal details and our network is protected and routinely monitored. We undertake regular review of who has access to information that we hold, to ensure that your information is only accessible by appropriately trained staff.
- 4.5 Any data sharing will be done on a considered and confidential basis, where appropriate, with:
- 4.5.1 Other employees of Tudor Hall;
  - 4.5.2 Volunteer partners closely related to us (e.g. OTA Committee, specific alumnae event organisers);
  - 4.5.3 Contractors providing services to you on our behalf or services to us (e.g. mailing houses);
  - 4.5.4 When using external companies to process data on our behalf, we do checks on them to ensure that their data protection policy meets our expectations and requirements.
  - 4.5.5 We do not sell personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.
  - 4.5.6 We aim to facilitate communication between individual OTs however we do not release personal details without consent. Where contact is requested by one OT for another we always check with that individual before releasing details.
- 4.6 **Keeping your information up to date** - We really appreciate it when you let us know if your contact details change.

- 4.7 Regular opportunities to update your details are provided via Personal Information Forms (PIFs) in digital and printed communications. OTs may also update their personal details and control some elements of their data by logging on to the OTA website using their personal, secure login.
- 4.8 **Our legal grounds for using your information** - The legal basis for processing your personal data is our legitimate interest. This means that the processing is necessary for legitimate interests except where the processing is unfair to you. We believe that there is a balanced and legitimate interest in our contacting members of the OT community with general news, information about events and development projects. There is no statutory or contractual requirement for you to provide us with any personal data.
- 4.9 **Sending information to other countries** - We may send your information to other countries where:
- 4.9.1 We store information on computer servers based overseas
  - 4.9.2 We communicate with you when you are living overseas
- 4.10 The European Commission has produced a list of countries which have adequate data protection rules.
- 4.11 If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is the UK. The School will only use processors to store data in such countries if adequate and GDPR compliant measures are in place.
- 4.12 **For how long do we keep your information?** - We will retain your data indefinitely or until you request us to do otherwise. We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.
- 4.13 **What decisions can you make about your information?** - From May 2018 data protection legislation gives you a number of rights regarding your information:
- 4.13.1 If information is incorrect you can ask us to correct it;
  - 4.13.2 You can also ask what information we hold about you and be provided with a copy. This is known as a Subject Access Request (SAR). We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to. If you request a SAR we have one calendar month to provide you with the information providing the request is reasonable and proportionate;
  - 4.13.3 You can ask us to delete the information that we hold about you in certain circumstances, for example, where we no longer need the information;
  - 4.13.4 You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;



- 4.14 Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- 4.15 Where you opt out of all future communications or exercise your right to erasure, we will continue to maintain a core set of personal data (name, matriculation and graduation details and date of birth) to ensure we do not contact you inadvertently in future, while still maintaining our record of your connection with the School. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).
- 4.16 The Bursar can give you more information about your data protection rights.
- 4.17 **Further information and guidance** - The Bursar is the person responsible at our school for managing how we look after personal information and deciding how it is shared.
- 4.18 Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and, most importantly, treat the information we get fairly.
- 4.19 This notice is to explain how we use your personal information. The Bursar can answer any questions which you may have. Please speak to the Bursar if:
- 4.19.1 You object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to; or
  - 4.19.2 You would like us to update the information we hold about you;
  - 4.19.3 Or you would prefer that certain information is kept confidential.
- 4.20 If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - <https://ico.org.uk/>
- 4.21 The Data Controller is Tudor Hall School at Wykham Park Banbury, Oxfordshire OX16 9UR and is registered with the ICO, registration number Z5684667.

Reviewed by Bursar: January 2025

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