



General Privacy Notice	
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Policy Owner	Director of Compliance
Policy Author	Director of Compliance / VWV
Governance	Regulatory Committee
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About this privacy notice

This privacy notice explains how Sedbergh Schools Group (the School or we) collects and uses your personal data.

Personal data is information about you from which you can be identified, either directly or indirectly.

We are the “controller”. This means we are responsible for deciding **how** and **why** we hold and use personal data about you and for explaining this clearly to you.

This privacy notice applies to:

- users of our website (our site), including the School shop
- users of our social media pages
- any person who provides services to us, either as an individual or as the employee or representative of a supplier to the School
- those who correspond with the School by post or electronic means; and
- visitors to the School.

It is important that you read this notice, together with any other privacy information or notices we may provide on specific occasions when we are collecting or processing personal data about you. This is to help ensure that you understand how and why we are using your information.

This privacy notice should be read in conjunction with our Cookies Policy.

Information we collect and process

We collect personal data directly from you when you contact or visit us, when you enquire about our products or services, when we establish you as a customer (for example, by purchasing items through the School shop), when we enter into a contract to receive goods or services from you or your employer, or when you use our website or social media pages.

We may also receive information about you from your employer or colleagues, for example, if your employer asks you to carry out work on our behalf.

We collect additional personal data from you throughout the course of our relationship.

In summary, we use your personal data for the following purposes:

- to fulfil obligations arising from any contracts between us and you, our customers, suppliers, or third parties
- to communicate with you, including providing information, products, or services
- to safeguard our pupils and other members of the School community; and
- where necessary, to support our business or activities, or those of our customers.

We set out below further information about these purposes and our lawful basis for processing personal data.

Customers of the School shop

- We collect and process your name, email address, telephone number, address, and bank details so that we can provide products and services to you. This processing is necessary for the performance of the contract between you and the School.
- We may also collect any feedback you provide on our products and services. This processing is necessary for the School's legitimate interests in managing the School shop and improving its products and services.
- We will hold information relevant to your order, such as clothing size. This information is needed for us to supply the items you have ordered. Where an order is placed on behalf of someone else, we rely on the School's legitimate interests to fulfil the order under our contract with you.

Suppliers, third party business contacts and prospects

- We process names, job titles, and business contact details, including addresses, telephone numbers, and email addresses, for you, your employees, and representatives. This is necessary for the School's legitimate interests in maintaining and managing its relationship with you. If we have a contract with you as an individual, such processing is necessary for the performance of that contract or for actions you request before entering into a contract.
- Where you are an employee or representative of a customer or contractor, we process this information on the basis of the School's legitimate interests in performing its contract with your employer.
- If there is an issue, such as a complaint about a service you provided, we rely on the School's legitimate interests to use personal data to address the matter. For example, to inform you of the issue so you can resolve it.
- We may conduct due diligence on those we work with, which can include credit checks, verifying photographic ID and proof of address of directors and, where relevant, shareholders, as well as checking registration details. We do this to comply with legal obligations and in pursuit of the School's legitimate interests in ensuring that the entities we contract with are financially viable and do not pose reputational risks.

Users of our site and social media pages

- When you browse our site or purchase products through it, we may collect information about your preferences and the types of products that interest you.
- We also collect technical information such as your Internet Protocol (**IP**) address used to connect to the internet, login details, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform.
- We collect information about your visit, including the full Uniform Resource Locator (**URL**) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times; download errors; time spent on certain pages; interaction details such as scrolling and clicks; methods used to leave the page; and any phone number used to contact us.
- Except where we need consent, we use this information in pursuit of the School's legitimate interests to correspond with you, provide personalised content, and ensure that our website and social media pages function effectively.
- **Correspondents with, and visitors of the School**

- When you contact or visit the School, we may collect information you provide, including your name, correspondence address and contact details, and the reason for your contact.
- We use this information to liaise with you and facilitate the purpose of our communication.
- When you visit, we will use your personal data to facilitate your visit and help ensure the School site remains safe for you and other members of the School community.
- We process your personal information in pursuit of the School's legitimate interests in responding to queries, arranging visits that benefit students and the School, and maintaining safety during such visits.

Other uses

- Regardless of our relationship with you, we may need to use your personal data for legal reasons, such as fraud prevention, ensuring compliance with our terms and conditions, and enforcing our legal rights. The School has legitimate interests in doing this unless a legal obligation requires otherwise.
- Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.
- We may contact you about our products and services by email, telephone, post or by text message, but only where data protection law allows. If you tell us, you do not wish to be contacted for these purposes, we will respect your preferences. We rely on the School's legitimate interests in marketing its products and services to you, unless your consent is required beforehand. If you give consent, you have a right to withdraw that consent at any time by contacting us at please complete. Any personal data processed before withdrawal of consent remains valid.
- We may monitor your use of our IT systems (including our Wi-Fi) during your visit to comply with our safeguarding obligations as a School, meaning our lawful basis for processing is public task.
- The School may rely on the recognised legitimate interests basis to process personal data for the following purposes:
 - (i) safeguarding children and vulnerable adults;
 - (ii) detecting, investigating or preventing crime, or apprehending or prosecuting offenders;
 - (iii) responding to certain types of emergencies (e.g. an extreme weather event);
 - (iv) for public security; or
 - (v) sharing personal data if requested by another organisation that needs it for its tasks in the public interest or its official functions.

Sharing your personal data

We may share your personal data with third parties in the following circumstances:

- When required by law, where necessary to perform our public tasks, to manage our working relationship with you, or where we have another legitimate interest. This includes sharing data with government bodies and regulators.
- If in the future we consider restructuring the charity that operates the School, we may share your personal data with the parties involved and with the relevant professional advisors. This

is in the School's legitimate interests to ensure that the charity continues to fulfil its charitable objects.

- We may share your personal data with third party service providers acting on our behalf, such as IT service providers. This notice covers those third-party providers as well.
- We may share your personal data with representatives or advisors of the third parties mentioned in this privacy notice. Those parties may also share information about you with us.

Overseas transfers

Your personal data will not be transferred outside of the UK.

How long will we use your personal data for?

We usually retain your personal data only as long as necessary to fulfil the purposes for which it was collected, including meeting any legal, accounting, or reporting requirements.

When deciding how long to keep your personal data, we consider factors such as the amount, nature, and sensitivity of the data, the risk of harm from unauthorised use or disclosure, the purposes of processing, whether those purposes can be met by other means, and relevant legal obligations.

If you have a contract with us, we will typically keep information for six or 12 years after the contract ends. This does not apply to our contract with parents for the education of their child.

In some cases, we may keep your personal data for longer than usual, but only if we have a good reason and are allowed to do so under data protection law. For example, as a School, we may need to keep information for longer (and in some cases indefinitely) to comply with our legal and safeguarding obligations. If you would like further information, please contact the Director of Compliance tr@sedberghschool.org

Your rights in relation to our processing of your personal data

You have the right to:

- object to the processing of your personal data (in certain circumstances). For example, if we use your data for direct marketing purposes, such as to send you an email about a product. You can also object if we rely on legitimate interests, recognised legitimate interests or on performing a task in the public interest as our lawful basis;
- request a copy of the personal data we hold about you
- ask us to correct any personal data we hold that is inaccurate or incomplete
- ask us to delete the personal data we hold about you
- ask us to restrict how we use your personal data (in certain circumstances)
- request the transfer of your personal data to you or to a third party, in a format that can be read by a computer (in certain circumstances).

If you want to exercise any of your rights, please contact the Director of Compliance tr@sedberghschool.org Please note that these rights do not apply in all cases.

We may ask you for specific information to confirm your identity and check that you have the right to access the information (or to exercise any of your other rights).

If you ask us to restrict how we use your personal data, or to delete it, this may mean we can no longer provide you with our products or services.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you do not 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, to provide you with goods or services. In this case, we may have to cancel a product or service you have with us, but we will notify you if that is the case at the time.

If you have any concerns about how we have handled your personal data, please contact us and complete our complaints form so that we have an opportunity to put things right. We have published our Data Protection Complaints Policy on our website. You also have the right to complain to the [Information Commissioner's Office](#).