



## Heckmondwike Grammar School

**Policy:** External Privacy Policy

**Status:** Statutory

**Last revision by:** L Daddy

**Date of last revision:** October 2018

**Open view on website:** External/Internal

**Equality Impact Assessment?** n/a

**Workload Impact Assessment?** n/a

Approved by:	Governing Body
Approval date:	27.11.18
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Action	Date	By whom
Saved in Staff Shared Drive	December 2018	DJN
On public website (if applicable)	October 2018	JDN
In review schedule	October 2019	LED



## HECKMONDWIKE GRAMMAR SCHOOL ACADEMY TRUST

### PRIVACY POLICY

#### ABOUT THIS POLICY

Heckmondwike Grammar School Academy Trust (“we” or “the School”) are committed to protecting your personal data. This privacy policy explains how we handle the personal data which we hold including the personal data we may collect when you use this website at [www.heckgrammar.co.uk](http://www.heckgrammar.co.uk). It also explains your privacy rights and how the law protects you, including how we comply with the General Data Protection Regulation (“GDPR”) and other related legislation which relates to the use of personal data.

We may change this policy from time to time by updating this page.

Additional information may be provided on particular pages of this website for example, on any specific pages where we collect personal data and you should also refer to those. We also operate cookies on our website and information about that is also provided separately in our [Cookies Policy](#).

#### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect and process your personal data when, for example:

- (a) you visit this website; and/or
- (b) you get in touch with us for any reason, including by phone, email or via this website.

It is important that you read this privacy policy together with any other statements or fair processing notices we may provide on specific occasions when we collect or process personal data, so that you are fully aware of how and why we are using your data. This privacy policy supplements those other notices and is not intended to override them.

#### HOW TO CONTACT US

For the purposes of this website and the information collected through it, Heckmondwike Grammar School Academy Trust is a data controller and is responsible for your personal data.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us, using the following details:

**Contact:**

Data Protection Officer (our current DPO is John Flynn – Finance Director)

**Address:** Heckmondwike Grammar School, High Street, Heckmondwike, West Yorkshire, WF16 0AH

**Email:** [office@heckgrammar.co.uk](mailto:office@heckgrammar.co.uk)

**Tel:** 01924 402202



You have the right to make a complaint to the Information Commissioner's Office (ICO) which is the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, like the opportunity to assist you with any concerns before you approach the ICO so please contact us in the first instance using the details above.

## YOUR OBLIGATIONS

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

If you provide us with information about any other person, for example if you are contacting us in a business capacity, information about any other individuals within your organisation or your business partners, then you must ensure that you have their consent to pass those details to us and for us to use those details in accordance with this privacy policy. You should also make sure that you bring this policy to their attention.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. For example, we provide links to UCAS and our Twitter and Facebook social media pages. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. You should read any policies and other statements on such websites carefully.

We may administer a payment from you via ParentPay. We use ParentPay as a third-party payment provider. When you would like to make a payment, for example, for school dinners or school trips, you will be transferred to ParentPay's website and you will be asked to provide certain personal data and financial information such as credit card details. The personal data you provide will be collected and dealt with by ParentPay and you should refer to ParentPay's privacy policies and notices in relation to this, for information about how the personal data you provide will be used.

## THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include data which has been anonymised such that a person's identity is removed.

We may collect, use, store and transfer different kinds of personal data. The categories of personal data which we use include:

- **Career Data** including your CV, career history information and references.
- **Identity and Contact Data** such as names, titles and other identifiers together with personal addresses, business addresses, fax numbers, email addresses and telephone numbers.



- **Technical Data** including internet protocol (IP) address, access times, your login data, browser type, 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. This may also include information about how you use our website.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We collect personal data in a number of ways. Often, it is collected directly through the website, for example if you provide certain identity information when you complete the form on our “Contact us” page. We may also collect it over the phone or through face to face interactions. The personal data we collect will be provided directly from you or in some cases might be provided by another individual.

Some of the technical data which we collect may be collected automatically as you interact with our website for example via the use of cookies and similar technologies.

## PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. The information below explains the purposes for which we use different categories of personal data and the legal basis or bases which we believe applies to those uses. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

We may process your identity and contact data and technical data, for the purposes of administering and operating this website. This may include troubleshooting, data analysis, testing, system maintenance and support. This helps us to continually improve this website. We process your data in this way on the basis that this is necessary for our legitimate interests in managing, administering and improving this website.

We may process your career data to deal with new enquiries about employment opportunities and to review any job applications we receive from you. This will be necessary for our legitimate interests in the operation of the school to be able to carry out recruitment, to assess your application for a vacancy at the school and to contact you in relation to your application or enquiry. This includes information you provide to us in a job application form, including an Application Form downloaded via our “Vacancies” page.

To ensure our third-party providers can perform their obligations to us, we may process identity and contact data and technical data. This will be necessary for our legitimate interests in ensuring that our third-party providers perform their services for us. For example, from time to time we may also use IT providers and marketing consultants for the proper function of the website and to help us promote the school.

If you contact us with a comment, enquiry (for example through our “Contact us” page or our “Register” page, where you have applied to register a pupil for the entrance exam at the school) or if you want to speak to us, we will use your identity and contact data in order to respond to you. Processing your data in this way is necessary for our legitimate interests in the operation of the school in order to respond to your enquiries.



## **CHILDREN'S DATA**

We have a separate privacy policy which provides details of how we process personal data relating to pupils enrolled at the School, and this policy should additionally be referred to where personal data about one of our enrolled pupils is being provided. We may also process identity and contact data relating to children who are not enrolled pupils at the School, for example if you make an enquiry in relation to a prospective pupil. This will be necessary for our legitimate interests, in order to deal with your enquiry. Where we process such personal data in relation to carrying out any of our tasks as a public authority, that processing will be necessary in the exercise of official authority vested in the School.

## **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, under the terms of a contract we have with you or the organisation you represent, or for another lawful reason and you fail to provide that data, we may not be able to fully perform our obligations in accordance with our contract, provide you with the information you require or otherwise properly deal with your request.

## **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 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 also 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.

If you would like further information about how we use personal data and the purpose which we might use it for, please contact us.

## **DATA TRANSFERS**

We do not transfer any personal data overseas.

## **DATA SECURITY**

We take reasonable technical and organisational precautions and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know it. 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.



## DATA RETENTION

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.

In some circumstances, we may anonymise 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 policy to you.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Those rights are listed below. Please contact us if you would like to exercise any of them. You have the right to:

- **Request access** to your personal data (a “data subject access request”). This means you can receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data. 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.** You can ask us to remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to object to processing, where we may have processed your data unlawfully or where we are required to erase your personal data to comply with law. We may not always be able to comply with your request where there are particular legal reasons.
- **Object to processing** of your personal data where we rely on a legitimate interest basis and if the processing impacts on your fundamental rights and freedoms. You can also object to direct marketing. In some cases, we may demonstrate that we have grounds to process your data which override your rights and freedoms.
- **Request restriction of processing.** You can ask us to suspend the processing of your personal data: if you want us to establish the data’s accuracy; where our data use is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims; or you have objected to use of data but we need to verify whether we have overriding legitimate grounds to use it.



- **Request a data transfer.** We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.
- **Withdraw consent at any time** where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

## EXERCISING YOUR RIGHTS

You will not have to pay a fee to access your personal data (or to exercise any 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. 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 personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you to clarify your request to speed up our response.

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 which case we will keep you updated.