

PRIVACY POLICY (Statutory)



Introduction

Welcome to Nunthorpe Multi-Academy Trust Limited's Privacy Policy. This is to be read in conjunction with our Privacy Notices for parents/carers and students.

Nunthorpe Multi-Academy Trust Limited 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.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Nunthorpe Multi-Academy Trust Limited collects and processes your personal data, whether through your use of our website (including any data you may provide through our website when you login to the student portal or use the 'contact us' form) or when you contact us by telephone or in person.

We may collect data relating to our students (for example, through use of our student portal by students, past students and prospective students).

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 is not intended to override them.

Controller

Nunthorpe Multi-Academy Trust Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) 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 DPO using the details set out below.

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Contact details

Our full details are:

Full name of legal entity: Nunthorpe Multi-Academy Trust Limited

Name or title of DPO: Mr R Beane

Postal address: Guisborough Road, Nunthorpe, England, TS7 0LA

Telephone number: 01642 310561

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.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 23 May 2018.

The data protection law in the UK will change on 25 May 2018. This privacy notice sets out most of your rights under the new laws.

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.

Third-party links

Our 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 do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

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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 personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes residential address, email address and telephone numbers.
- **Educational Data** includes education history, exam results, any special educational needs and any behavioural information.
- **Financial Data** includes bank account and payment card details (to the extent that you are required to pay for any of our services using our ParentPay website).
- **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 our website.
- **Profile Data** includes your username, password and educational information (to the extent that you are granted a login to use our student portal).
- **Usage Data** includes information about how you use our website and any of our services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties (if applicable) and your communication preferences. As at the date of this privacy notice, we do not provide any marketing.

We may also collect, use and share **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. 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.

This policy will be kept under regular review in light of legal developments and best practice.

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We may from time to time collect **Special Categories of Personal Data** about you, but only if we have received your explicit consent. This includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data, criminal convictions and offences. For example, we may collect biometric data from our students in the event that we use fingerprints to provide school dinners instead of paying with cash. We may also process information about children's services interactions, free school meal status, pupil premium eligibility, elements of special educational need information, safeguarding information and some behaviour data, which we also treat as Special Categories of Personal Data.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract 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, to provide you with services such as educational courses or classes). In this case, we may have to cancel a service but 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:

- **Direct interactions.** You may give us your Identity, Contact, Educational and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - wish to receive our services;
 - wish to be admitted as student (or admit a child as a student) to our multi-academy trust;
 - create an account on our website (such as on our student portal);
 - subscribe to our service or publications (if applicable);
 - request marketing to be sent to you (if applicable);
 - enter a competition, promotion or survey;
 - make an enquiry or request information from us; or
 - give us some feedback.

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- **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 and other similar technologies.
- **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 the following parties:
 - (a) analytics providers;
 - (b) advertising networks; and
 - (c) search information providers.
 - Contact, Financial and Transaction Data from providers of technical and payment services.
 - Identity, Educational and Contact Data from Local Authorities, other educational establishments, education regulators or funders (such as the Department for Education or the Education and Skills Funding Agency).
 - Identity, Educational and Contact Data from publicly available sources.

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:

- **Public Task** - the necessary performance of a public task in the public interest or for our official functions, where the task or function has a clear basis in law.
- **Performance of Contract** - processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interests** - the interest of our multi-academy trust in conducting and managing its business to enable us to give you the best educational services 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.

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- **Legal or Regulatory Obligation** - processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications (if applicable) or collecting or processing any Special Categories of Personal Data. You have the right to withdraw consent at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of some of 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.

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a student or the parent/guardian of a student	(a) Identity (b) Contact (c) Educational	(a) Public Task (b) Necessary to comply with a legal obligation
To process and deliver our educational services: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Educational (d) Financial (e) Marketing and Communications	(a) Public Task (b) Necessary for our legitimate interests (to recover debts due to us)
To enable you to login and use our student portal	(a) Identity (b) Contact (c) Educational	(a) Performance of a contract with you (b) Public Task (c) Necessary to comply with a legal obligation (d) Necessary for our legitimate interests (to keep our records updated and to study

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		how students access our services)
To contact parents/guardians regarding school information or about their children (for example, in the event of an emergency)	(a) Identity (b) Contact (c) Educational	(a) Public Task (b) Necessary to comply with a legal obligation
To maintain records of assessment information, exam results, School Census and attainment tracking	(a) Identity (b) Contact (c) Educational	(a) Public Task (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To maintain child protection and safeguarding information	(a) Identity (b) Contact (c) Educational	(a) Public Task (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Notifying you about changes to, or detail of, our educational services (b) Asking you to leave feedback or take part in a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how students access our services)
To enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how students access our services, to develop them and grow our multi-academy trust)
To administer and protect our multi-academy trust and our website (including troubleshooting, data analysis, testing, system maintenance,	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our multi-academy trust, provision of administration and IT services, network security, to prevent fraud and in the context of a business

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support, reporting and hosting of data)		reorganisation or restructuring exercise) (b) 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 to you (if applicable)	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how students access our services, to develop them, to grow our multi-academy trust and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types website user, to keep our website updated and relevant, to develop our business and to inform our marketing strategy (if applicable))
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Educational (d) Technical (e) Usage (f) Profile	Necessary for our legitimate interests (to develop our services and grow our multi-academy trust)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. As at the date of the privacy notice, we do not undertake any direct marketing or allow any third party direct marketing. In the event that we choose to do so, we will update this privacy notice accordingly.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

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A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website.

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose	More information
resolution	To serve appropriately sized images to your device	http://adaptive-images.com/
wordpress_test_cookie	To test for cookie capability	https://wordpress.org/
comment_author, comment_author_email	To remember a commenting user's data	https://wordpress.org/
wp-settings, wp-settings-time	To remember a logged-in user's preferences	https://wordpress.org/
__utma, __utmb, __utmc, __utmv, __utmz	To track user activity	http://www.google.co.uk/intl/en/policies/privacy/
NREUM,	To track user activity	https://docs.newrelic

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NRAGENT, JSESSIONID		.com/docs/browser/new-relic-browser/page-load-timing-resources/new-relic-cookies
khcookie, NID, SNID and PREF	To provide interactive location maps	http://www.google.com/intl/en/policies/privacy/
APISID, HSID, NID, PREF, SSID, SID, SAPISID	To provide search functionality	http://www.google.com/intl/en/policies/privacy/
SERVERID, UID, UIDR, __qca	To provide embedded slideshows	https://www.linkedin.com/legal/privacy-policy

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

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. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External third parties including Local Authorities, safeguarding units, education regulators, funding providers and other educational establishments.

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- Third parties that may transfer or acquire any of our business or our assets. If a change happens to our business, your personal data will be used in the same way as set out in this privacy notice.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, auditors and insurers.
- HM Revenue & Customs.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers 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.

6. International transfers

We do not transfer your personal data outside the European Economic Area.

7. Data security

We have put 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 (such as the Information Commissioner's Office) of a breach where we are legally required to do so.

8. Data retention

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

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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 can be requested by contacting us.

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.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

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.

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- **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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

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.

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.

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.

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OFFICIAL POLICY FOR

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This policy will be kept under regular review in light of legal developments and best practice.

Next Review Date – May 2020
Author – N Goodall, Director of Finance & Operations
Approved by the Board of Trustees on 23 May 2018