

Julian's Primary School – Website Privacy Policy

At Julian's Primary School, we respect your privacy rights and take the security of your Personal Data very seriously.

This privacy policy sets out how we use and protect any Personal Data that you give us when you use our website.

Personal Data is any information capable of identifying an individual ('data subject'). This information may include but is not limited to: Name, address, email, telephone number, IP address.

From 25th May 2018 when the General Data Protection Regulations (GDPR) came into effect, you have greater rights on the Personal Data or Personally Identifiable Information (PII) that we hold about you.

What Personal Data do we collect

Julian's Primary School collects Personal Data requested on our website <https://www.juliansprimary.org.uk/> for the purpose of responding to an enquiry.

This may include:

- Your name
- Your child's name
- Your email address
- Your telephone number
- Your demographic information, including your postcode

Julian's Primary School uses cookies including Google Analytics on our website to analyse how our website is used. With the exception of an approximate location (Gained from an IP address), the data collected by Google Analytics is mostly anonymous. It is not used for any additional purpose such as profiling or identifying visitors to the Julian's Primary School website.

Google has its own privacy policy; which we strongly suggest you review. Google may use the information collected through Google Analytics to evaluate Users' and Visitors' activity on our site. For more information, see [Google Analytics Privacy and Data Sharing](#).

It is very important that the Personal Data that we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at sreid@juliansprimary.org.uk and we will update it accordingly.

How do we use your Personal Data

Julian's Primary School will only process Personal Data where we have a legal basis to do so.

Julian's Primary School uses Personal Data from our website primarily for the purpose of fulfilling an enquiry.

Julian's Primary School may use Personal Data where it is necessary for our legitimate interests and the interests and fundamental rights of the data subject do not override those interests. These legitimate interests include:

- Developing our services and growing our business.
- Recovering debts owed to us.
- Advising of changes to our services, prices or policies.

Julian's Primary School may use Personal Data where we need to comply with a legal obligation.

How do we protect your Personal Data

Julian's Primary School has put in place appropriate security measures and controls 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 and other third parties who have a business need to use such data. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

When you enter Personal Data on our website, it is encrypted in transit using TLS/SSL and transmitted over HTTPS.

We maintain appropriate administrative, technical and physical safeguards to protect Personal Data at rest on our systems. This may include password protection, access/authentication controls, pseudonymisation and encryption.

How long do we retain your Personal Data

Julian's Primary School will only retain your Personal Data for as long as is necessary to fulfil the purposes for which it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Personal Data collected from our website for the purpose of responding to an enquiry is retained by Julian's Primary School as per the retention period in the School's Data Retention Policy and then is securely deleted.

Any Personal Data collected for the purposes of direct marketing is retained by Julian's Primary School for as long as you give us your explicit consent to do so.

International transfer of Personal Data

Julian's Primary School do not transfer any of your Personal Data collected from our website to systems outside of the European Economic Area (EEA).

Data Controller and Processor

Julian's Primary School processes Personal Data both as a Controller and as a Processor as defined in the GDPR.

All Personal Data is stored securely on Digital Ocean, Amazon Web Services or other platforms. All website hosting is performed in accordance with the highest security regulations. Julian's Primary School has sought confirmation from its providers, ensuring compliance with the GDPR. Eg. All data is processed on servers in the European Economic Area (EEA) only.

Third Party Processors

Julian's Primary School works with a number of third-party service providers including but not limited to the ones named in the 'Data Controller and Processor' section.

These third parties may have access to, or process Personal Data or Client Data as part of providing those services for us. We limit the Personal Data provided to these service providers to that which is reasonably necessary for them to perform their functions. We have sought confirmation that our third-party processors and service providers are GDPR compliant, thus requiring them to maintain the confidentiality of any Personal Data provided to them.

Children's Privacy

Children need particular protection when you are collecting and processing their personal data because they may be less aware of the risks involved. Julian's Primary School may collect Personal Data from children under the age of 13 as part of an enquiry on our website by a parent. We have provisions in place to enhance the protection of this Personal Data.

Data breach or compromise of Personal Data

Julian's Primary School have put in place procedures to deal with any suspected data breach.

In the event that Personal Data is compromised as a breach of security, Julian's Primary School will promptly notify any affected data subjects as well as the Information Commissioner's Office (ICO) in compliance with the GDPR.

Your Rights

From 25th May 2018, data subjects have extended rights in relation to our use of their Personal Data.

Children have the same rights as adults over their personal data and pupils attending any type of school have a right of access under the Data Protection Act 1998 to their own information. This is known as the right of subject access. When a child cannot act for themselves or the child gives permission, parents will be able to access this information on their behalf.

Subject access rights include:

Right of access to your Personal Data

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. You will not have to pay a fee to access your Personal Data. However, we may charge a reasonable fee if your request is manifestly unfounded, excessive or repetitive.

If your request is made electronically, we will provide the Personal Data in a commonly used electronic format, once we have verified your identity. Else it will be in writing.

Right to rectification

Julian's Primary School takes reasonable steps to ensure that the Personal Data we hold about you is accurate and complete. However, if you do not believe that this is the case, please contact us and make a request for rectification verbally or in writing.

Please note that Julian's Primary School can refuse to comply with a request for rectification if we believe that we are satisfied that the data is accurate or that a request is manifestly unfounded or excessive (In which case we can charge a reasonable fee before dealing with the request).

In either case we will contact you within one month of the request.

Right to erasure

This right is also known as 'the right to be forgotten'. It is not absolute and only applies in certain circumstances, whereby you have the right to ask us to erase your personal information. An example would be where the Personal Data we collected is no longer necessary for the original purpose for which it was collected or where an individual withdraws their consent (Where consent was the lawful basis for holding the data).

Please note that a request for right to erasure also needs to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

Right to restrict processing

This is not an absolute right but in certain circumstances, as an alternative to requesting the erasure of Personal Data, you are entitled to ask us to stop using your Personal Data. An example would be where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to process your personal information.

When processing is restricted, Julian's Primary School are still permitted to store the Personal Data but not to use it.

Right to data portability

In certain circumstances, you have the right to ask that we transfer any Personal Data that you have provided to us to another organization or third party. The

Personal Data will be provided free of charge and in a structured, commonly used and machine-readable form such as a CSV file.

Right to object

You can ask us to stop sending you direct marketing messages at any time. Julian's Primary School will stop processing Personal Data for direct marketing purposes as soon as we receive an objection.

Right not to be subject to automated-decision making

An individual has the right to object to their Personal Data being input into a system or computer and a decision or profile being calculated by an automatic process rather than by a human.

Julian's Primary School do not make automated decisions or carry out profiling using Personal Data.

Right to withdraw consent

Where Julian's Primary School has asked you for explicit consent, you have the right to withdraw your consent to further use of your Personal Data at any time. Please note we may not be able to provide you certain services if you withdraw your consent.

If you wish to exercise any of the rights set out above, you can do so by contacting us in the 'How to Contact Us' section below. You will not have to pay a fee. However, we may charge a reasonable fee for the administrative costs of complying with the request if your request is manifestly unfounded, excessive or repetitive.

We may also 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.

Once we have confirmed your identity, we will endeavour to implement any requests within 7 days and no later than one month from the time of the original request.

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.

Links to other websites

This Privacy Policy does not cover hyperlinks that may exist within <https://www.juliansprimary.org.uk/> to other websites. You are strongly encouraged to read the privacy policies on any other website that you visit.

Cookies

The Julian's Primary School website uses cookies to give users the best possible experience. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies,

please note that some parts of the Julian's Primary School website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

How to Contact Us

If you wish to contact us, wish to withdraw your consent or have any additional questions about Julian's Primary School collection and storage of your Personal Data, the Data Protection Officer details are:

Craig Stilwell
Judicium Consulting Ltd,
72 Cannon Street,
London, EC4N 6AE

Email: dataservices@judicium.com
Telephone: 0203 326 9174

If you are not happy with any aspect of how Julian's Primary School collect and use your data, you have the right to lodge a complaint to the Information Commissioner's Office (ICO) <https://ico.org.uk/>, who are the UK supervisory authority for data protection issues.

However, we would be grateful if you could contact our Data Protection Officer first if you do have a complaint so that we can try to resolve it for you.

Changes to this Privacy Policy

We keep our Privacy Policy under regular review and may update it from time to time.

Last updated: 13/02/2020