



PRIVACY NOTICE FOR STUDENTS

1. WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is to help you understand how and why the school collects personal information about you and what we do with it. It also explains your rights and the decisions you can make about the personal information we hold about you.

The school is responsible for deciding how we hold and use personal information about you. This makes d'Overbroeck's a "data controller" under data protection law.

The school holds only the personal information we are allowed to hold about you, and uses it only for limited purposes. Your privacy is important to us and we want to keep your personal information safe.

In the event of an epidemic or pandemic, the school may need to collect, share and process personal data in accordance with Government guidance. This may be for special reasons not mentioned in this Privacy Notice but the reasons will always be to protect public and individual health by trying to limit the spread of infection.

2. WHAT IS PERSONAL INFORMATION?

Personal information is information that identifies you as an individual and is about you. This includes information such as your name, address and date of birth as well as things like exam results, medical details, academic and behaviour records, and maybe your religion. Photographs, digital recordings of you and CCTV recordings are also personal information because they identify you as an individual person.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The school requires certain information in order to do its job. This includes, for example:

- your personal information (such as your name, title, date of birth, nationality, addresses, telephone numbers, email addresses);
- your academic, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- information about your health and welfare, and contact details for someone in case of an emergency;
- reports or investigations that involve you, such as bullying issues. This may include communications with your parents/guardian, teachers or other students;
- references we give or receive about you, and information provided by your previous schools and professionals and organisations that have worked with you;
- copies of your official documents, such as passport and birth certificate, (and, for international students, UKVI visa and CAS);

- medical information (such as medication you are required to take and food allergies);
- images or videos of you taking part in school or other activities, and images captured by the school's CCTV system;
- information relating to your presence at virtual Open Days, Parents Evening and other online events, including visits to our website and use of IT educational tools used by you;
- information collected through cookies and other IT tracking technologies, including but not limited to, IP address, domain name, browser version and operating system, traffic data, location data, web logs and other communication data resources that are accessed, and the associated telemetry data, eg, how long you spent watching a video;
- any court order relating to you (if relevant).

4. HOW WE COLLECT YOUR PERSONAL INFORMATION

The school receives most of the personal information directly from you or from your parents/guardians. This may be through a form, or simply in our day-to-day contact with you (such as emails, verbal conversations or by monitoring IT systems that you use for classwork/homework).

From time to time your personal information may be supplied by others. For example, we may receive information from:

- another school
- professionals or authorities that have worked with you
- an agent that helped you get a place at the school.

The majority of the personal information you provide to us is mandatory, which means that you must provide it to us. Other personal information you provide to us is optional, which means that you may decide not to provide it to us. We will let you know when the personal information we request is optional.

Your duty to inform us of changes

If you move house, change your email address, telephone number or other personal details, it is important that you or your parents/guardian let us know so that the information we hold is accurate.

5. WHY WE COLLECT YOUR PERSONAL INFORMATION

The school needs to process a wide range of personal information in order to carry out its normal day to day activities. Examples include:

- a) to decide whether you can join the school (and consider whether bursaries or scholarships will apply) and, if you join us, to fulfil the administration required to enrol you;
- b) to make sure we provide you with a high quality of education;
- c) to monitor and report on your progress. We may process your personal data manually or electronically (including through learning tools that may use the latest technologies such as machine learning) in order to understand how you are progressing;

- d) to support your learning and education, help you understand how to improve your learning, and to assess your suitability for current and future internal and external opportunities;
- e) to make sure your health and wellbeing are looked after;
- f) to support, develop and improve the school's teaching, curriculum and educational tools.
- g) to promote the school and its events, eg, on the school website and via the school's social media channels;
- h) to share and celebrate your achievements with others;
- i) to ensure the school complies with the law and meets its legal obligations.

6. THE BASIS FOR USING YOUR PERSONAL INFORMATION

There are three reasons we can use your personal information.

a) Contract

Under a contract with your parents, we have promised to support your learning and education at the school. Most of the personal information we collect about you is needed to make sure we can provide this support. For example, to keep your parents/guardian informed of your educational progress, and to arrange trips, activities and careers advice.

b) Law

Some school duties are required by law and we use your personal information to meet these legal obligations. For example, to ensure you are kept safe and healthy, or to provide statistics for the government.

c) Legitimate interests

The legitimate interests of the school are tasks carried out by the school for which we have a good reason and which are not restricted in any way by a contract or current law. For example, we will use your personal information when deciding whether you can join the school, when we ask for professional advice from someone outside the school, and when we use photos of you so that we can identify you and for marketing purposes. We also record the presence and activity of visitors to virtual events such as Open Days.

7. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

Sometimes we need to use sensitive personal information about you. You may also hear this called 'special category data'. This information may include your medical or dietary requirements, health records, religion, sex life or sexual orientation. Collecting this information helps us to provide advice or support to meet your specific needs, such as observing religious or cultural celebrations, or responding to sensitive issues that may arise. Before we collect this information, we will usually ask for your (and/or your parents') clear permission to use it.

We may also process any criminal convictions or offences concerning you. This is because we have a safeguarding obligation to provide you with support and to work with appropriate authorities. This data will only be processed when it is in the interests of a student or for reasons of substantial public interest.

8. SHARING YOUR INFORMATION WITH OTHERS

Most of the personal information we collect stays within the school and will be processed only by school staff who need to know it. However, sometimes it is necessary for us to share your personal information with people outside the school, in order to fulfil the contract, legal and legitimate interests mentioned above. Examples of these people are:

- schools that you attend after leaving us;
- service providers for administration and IT services, such as web developers, virtual event facilitators or cloud storage providers, although this is not sharing your data in a legal sense, as these are considered data processors on our behalf;
- suppliers who help us to provide educational and extra-curricular services, including after-school programmes, catering, transportation, and programme partners Julliard, MIT and UNICEF, and IT contractors who help us develop our products and services;
- our parent company, Nord Anglia Education, so that we may make efficient use of our resources and provide careers guidance;
- travel companies organising school trips;
- appropriate regulatory bodies such as the Department for Education, the Independent Schools Inspectorate, the Information Commissioner's Office, the Charity Commission, the local authority, Ofsted, police, professional advisers, auditors, or other regulators.

9. TRANSFERRING STUDENT, PARENT AND GUARDIAN DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area.

We will only transfer personal data to a country or territory outside the European Economic Area if the following conditions apply:

- if the transfer is to a place that is regarded by the European Commission as providing adequate protection for your personal information; or
- if we have put in place appropriate safeguards to ensure that your personal information is protected, such as both parties involved in the transfer signing standard data protection clauses adopted by the European Commission); or
- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defence of legal claims.

We have put in place measures to protect the security of your information. If you would like details of these measures please contact us (see section 14).

10. DATA SECURITY

When others use your personal information we make sure that they keep it secure and use it for a specific and legitimate reason. They will only use your personal information in the way that we have agreed with them and will treat your personal information as confidential.

The school has arrangements with service providers for administration and IT services, such as web developers, virtual event facilitators or cloud storage providers. This is not sharing your data in a legal sense, as these providers are considered data processors on our behalf. Arrangements with them are always made with written guarantees that personal data will be kept securely and only in accordance with the school's specific directions.

If your personal information is used in a way that is not acceptable, we have a procedure to deal with this. For example, if your personal information is accidentally lost we will let you know about this and we may also contact the Information Commissioner's Office about it.

11. DATA RETENTION

The school will keep your personal information securely and only in line with how long it is necessary to keep it for a lawful and legitimate reason. For many student records this will be until you reach 25 years of age, although safeguarding, incident reports and some examination data needs to be kept for much longer.

When we no longer have a lawful reason to hold it, we will delete or destroy your personal information securely. In some circumstances we may anonymise your personal information. This means that your information can no longer be linked to you and you will not be identified. If we do this, we may use this information without telling you.

You can find out more about how long we keep your personal information by taking a look at the Data Retention Policy available from the [policies page of our website](#).

12. YOUR RIGHTS

The law considers your personal information to belong to you. You therefore have various rights under Data Protection law:

- **Subject Access Request** – you may ask to see a copy of personal data we hold about you, provided you are mature enough in the opinion of the school to understand the request you are making;
- **Rectification** – you may ask for a correction of your personal information to ensure it is accurate;
- **Erasure** – you may ask for your personal information to be deleted. This is sometimes referred to as 'the right to be forgotten';
- **Restriction** – you may ask for us to limit the processing of your personal information in some circumstance, for example, whilst we resolve a complaint;
- **Portability** – you may ask for a copy of any personal data you have provided to us to be returned to you, or transmitted to another controller, in a commonly used machine readable format;
- **Objection** – you may withdraw consent for us processing a specific type of personal information that requires your voluntary consent, for example asking us to stop using certain types of images in printed material or on the website;
- You may also request further detail about the safeguards we have in place regarding transfers of personal information outside of the EEA and, where applicable, a copy of the standard data protection clauses that we have in place.

If you want to do any of the above, please contact us in writing (see section 14). The school will endeavour to respond to any such requests as quickly as reasonably practicable, and in any event within statutory time-limits, which is one month in the case of requests for access to information.

If your parent/guardian wishes to make a subject access request on your behalf and you are an older student, generally aged 13 and above, they may need to prove they have your written permission for it to be carried out. However, in some situations the school may consider there are lawful grounds for sharing your personal information with your parent/guardian without reference to you.

Requests that cannot be fulfilled

The right of access is limited to your own personal information. The school therefore cannot disclose:

- information which identifies other individuals;
- information which is subject to legal privilege, such as legal advice given or sought by the school, or documents prepared in connection with legal action;
- information which discloses student examination scripts or other information consisting solely of student test answers or test marks ahead of any ordinary publication;
- any confidential reference given by the school for the purposes of the education of any individual.

Each individual generally has the 'right to be forgotten' by an organisation but the school may have compelling reasons to continue to hold or process your personal information, for example, a legal requirement, or where it falls within a legitimate interest in this Privacy Notice. Many student records must be kept by the school until you reach the age of 25, and other data, such as safeguarding records, must be kept for longer. All requests will be considered on their own merits.

Your right to withdraw consent

Where you have voluntarily supplied optional personal information, you can withdraw this consent at any time. Examples may include certain types of images or helping to promote and run a careers event.

Student rights

In general, the school will assume that you do not need to give consent for us to disclose personal data to your parents, such as keeping them informed about your activities, progress and behaviour, and in the interests of your welfare.

However, if you seek to raise concerns confidentially with a member of staff and expressly withhold consent for that information to be disclosed to your parents or to another appropriate organisation, the school may be obliged to maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise, for example where the school believes disclosure will be in the best interests of you or other students, or if required by law.

13. CHANGES TO THIS PRIVACY NOTICE

We may update this notice from time to time and publish a new version on the [Privacy Notices page](#) of our website. If any substantial changes affect your rights we will inform you directly as far as is reasonably practicable. We may also let you know in other ways about how we use your personal information.

14. CONTACTS AND COMPLAINTS

If you have any questions about this privacy notice or how we handle your personal information, or if you wish to exercise any of your legal rights, please contact the Data Compliance Administrator via tracy.roslyn@doverbroecks.com.

If you are unhappy with how we are using your personal information, you or your parents/guardian can make a complaint at any time to the Information Commissioner's Office (ICO) www.ico.org.uk, the UK supervisory authority for data protection issues. We recommend that you discuss any concerns with us first before going to the ICO.

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