



From: The Headteacher: Mr I Sterling
E:ian.sterling@castlehouseschool.co.uk
T: 01952 567600

Data Protection Policy

Actions	Date / details	Detail	By whom
Date originally published	April 2024	New policy	IS
Adopted by Governors	April 2024		Governors
Amended	August 2024		IS
Adopted by Governors	August 2024		Governors
Review Date	Aug 2025		IS

Terms

Haberdashers' Castle House School maintains two websites, from a common provider. www.castlehouseschool.co.uk and [Home | Castle House Nursery School](#) (collectively, for the purposes of this statement, they will be known as "the Site") and the information and materials on the Site ("Content").

Disclaimer. Whilst **Haberdashers' Castle House School** takes care to ensure the accuracy of the Content, to the extent permitted by law, **Haberdashers' Castle House School** assumes no legal liability for and does not warrant that the information contained on this website is accurate or complete, or that these web pages will be free from errors or that its availability will be uninterrupted and **Haberdashers' Castle House School** hereby expressly disclaims and excludes all express and implied warranties terms or conditions not stated herein, so far as such exclusion or disclaimer is permitted under the applicable law. **Haberdashers' Castle House School** excludes all liability to any person for any loss or damage caused by any errors or omissions, whether such errors or omissions result from negligence, accident or any other cause but this disclaimer is without prejudice to any claims for fraudulent misrepresentation, personal injuries or death.

Restrictions on Use of Content. The Content of this website and all copyright and other intellectual property rights therein belong to **Haberdashers' Castle House School** or its Content providers. You are hereby granted permission to access the Site and print a copy of the Content as a record of your visit. All other use of the

Site and its Content, including modification, publication, transmission, creation of derivative works, incorporation into another web site or reproducing the Site or the Content (whether by linking, framing or any other method) is not permitted without **Haberdashers' Castle House School** prior express written consent.

Privacy Policy

This privacy policy (this "Policy") explains how personal information is collected, used, and disclosed by **Haberdashers' Castle House School** (collectively, "**Haberdashers' Castle House School**", "we", "our" or "us"). This Policy applies to visitors and users (individually, "you") of the **Haberdashers' Castle House School** website. By visiting or using the Site to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Policy, although consent may not be required for all of the elements described in this Policy. For particular types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it.

This Policy does not cover third parties or their services and we do not take any responsibility for how such third parties may use any information they collect. For information about third-party privacy practices, please consult with them directly.

I. INFORMATION WE COLLECT

Personal Information. By visiting or using the Site, we may collect the following categories of personal information ("personal information") you provide to us: name; title; email address; postal address; phone number (including your mobile phone number); children's names; job role; marketing responses; admissions follow-ups; and other information you may provide about yourself to the Site or to which you provide us with access via third-party platforms.

We do not proactively collect personal information considered as sensitive personal information such as health-related or financial information on the Site. However, our Site may include text boxes which are designed for you to provide your choice of certain information about your marketing preferences.

If you are an existing **Haberdashers' Castle House School** family, we will combine this information with information we collect on the Site and use it for the purposes described below.

Device Information. When you visit the Site or open communications (such as emails), some information is automatically collected from devices (e.g., mobile, computer, laptop, tablet) used to visit or use the Site including, but not limited to, operating system, access times, browser information (e.g., type, language, and history), settings, and other data about your device that we use to provide the services or as otherwise described in this Policy ("device information"). We also collect information about your usage and activity on the Site using certain technologies, such as cookies, web beacons and other technologies (see V Cookies and Other Tracking Technologies for more details).

Location Information. If you use our Site, we may receive your generic location (such as city or neighbourhood). We may use and store this information to provide and improve features of the Site, for example, to tailor the Site on a needs-based manner to better facilitate your requests and to provide you more relevant content.

II. HOW WE USE YOUR INFORMATION

We may use your information for the following purposes (“Purposes”), to: provide you with the services, and functionality offered through the Site and fulfil your requests, including, but not limited to; communicate with you about your enquiry or use of the Site, services, or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service; communicate with you about special events and other marketing communications; operate and improve the Site, services, and functionality; process and provide events to attend, if applicable; tailor your experience on the Site, including search results and displaying relevant promotions; link or combine with other information we get from third parties to help understand your needs and provide you with better service; perform statistical analysis; protect, investigate, and deter against fraudulent, unauthorised, or illegal activity; comply with our policies, procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain of your information, we may not be able to fulfill the requested Purpose of collection, such as to respond to your queries or provide the Site to you.

Combined Information. We may combine your personal information with device information and location information (with your consent, where required) to serve you specifically, such as to deliver a service to you according to your preferences or restrictions, or for advertising or advertising targeting purposes. When we combine personal information, device information and location information in this way, we treat it as, and apply all of the safeguards in this Policy applicable to, your information.

Electronic Communications. Consistent with the above Purposes, we may communicate with you via electronic messages, including email, text message, or mobile push notification to, for example: send you information relating to our school, including event reservation and waitlist confirmations and updates, receipts, technical notices, updates, security alerts, and support and administrative messages; and/or, subject to the Your Choices section, below, and/or applicable law, communicate with you about events, offers, promotions, upcoming events, and other news about services offered by **Haberdashers’ Castle House School**.

• We will retain your information for the period necessary to fulfil the Purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

III. HOW WE SHARE YOUR INFORMATION

We do not share your information with third parties other than as described above and as follows:

We may disclose your information to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of **Haberdashers' Castle House School** or others, or to respond to emergencies.

We may otherwise share your information as directed by you or subject to your consent.

Information You Share Socially. The Site may allow you to connect and share your actions, comments, content, and information publicly or with friends. The Site may also allow you to connect with us on, share on, and use third-party platforms, including those on which **Haberdashers' Castle House School** has a presence. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. **Haberdashers' Castle House School** also does not control the privacy practices of third-party platforms. Please contact those sites and services directly to learn about their privacy practices.

IV. SECURITY OF YOUR INFORMATION

Haberdashers' Castle House School takes commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction.

If credit or debit card account information is being transmitted to the Site or through the Site, it will be protected by cryptographic protocols. To be clear, **Haberdashers' Castle House School** website does not itself store your credit or debit card account information, and we do not have direct control over or responsibility for your credit or debit card account information. We use third party payment processors that are the controllers of your credit card information. Our contracts with third parties that receive your credit or debit card account information require them to keep it secure and confidential.

Nonetheless, we cannot guarantee that transmissions of your credit or debit card account information or your other information will always be secure or that unauthorised third parties will never be able to defeat the security measures taken by **Haberdashers' Castle House School** or our third-party service providers. Except to the extent that liability cannot be excluded or limited due to applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorised third-party access, or other causes beyond our control. You play an important role in keeping your information secure. You

should not share your user name, password, or other security information for your **Haberdashers' Castle House School** account with anyone. If we receive instructions using your user name and password, we will consider that you have authorised the instructions.

How we secure your data. Information system and data security is imperative to us to ensure that we are keeping our clients and subscribers happy.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit we minimise the risk of unauthorised access or disclosure; when entering information on the Site, you can check this by right clicking on the padlock icon in the address bar.

Storage of information. The **Haberdashers' Castle House School** hosting operations are based in the UK and we store most of our data within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected. Some of our social media channels are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However we only allow this when we certain it will be adequately protected. (e.g. US Privacy Shield or Standard EU contractual clauses).

V. COOKIES AND OTHER TRACKING TECHNOLOGIES

Cookies are small text files that can be used by websites to make a user's experience more efficient.

We collect information about your usage and activity on the Site using certain technologies, such as cookies, web beacons, and other technologies. We and our third-party service providers, and/or partners may also place web beacons for measuring sales and marketing campaigns.

The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Policy, except as required by law.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission. Your consent applies to the Sites.

Your current state: Allow these cookies (Necessary, Statistics, Marketing)
Change your consent | Withdraw your consent

VI. YOUR CHOICES

Email. If you do not want to receive marketing and promotional emails from **Haberdashers' Castle House School**, you should contact the school office

directly and opt-out of marketing email communications. Alternatively, to the extent that applicable law requires your prior opt-in consent to receive marketing and promotional emails, you can choose not to opt-in. Please note that even if you opt-out of receiving marketing communications from the Site, we may need to send you service-related communications, such as confirmations of any future reservations to our events.

VII. YOUR RIGHTS

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- You can [Contact Us](#) to request to exercise these rights at any time, below.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent. Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest. In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing. You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Keeping your information. We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

VIII. LINKS TO OTHER WEBSITES

The Site may contain links to other websites or services that are not owned or controlled by **Haberdashers' Castle House School**. This Policy only applies to information collected by the Site. We have no control over these third party websites, and your use of third party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third party websites linked to the Site. Your use of

third parties' websites linked to the Site is at your own risk, so we encourage you to read the privacy policies of any linked third party websites when you leave one of the Site.

IX. CHANGES TO THIS POLICY

Except to the extent limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on the Site, and as required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the "Last Updated" date at the top. You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using the Site. If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of the Site.

If we make any changes to this Policy that materially impacts previously collected information about you, we will obtain your prior express consent.

X. CONTACT US

If you have any questions about this Policy or information we have collected about you, please [Contact Us](#). We will aim to respond to all queries within 30 days.

What to do if you're not happy. In the first instance, please talk to us directly so we can resolve any problem or query. You also have the right to contact the Information Commissions Office (ICO) if you have any questions about Data Protection. You can contact them using their help line 0303 123 113 or at www.ico.org.uk.

Haberdashers' West Midlands Academies Trust: We share your personal data with other Haberdashers' schools within Haberdashers' Academies Trust South, Haberdashers' Monmouth Schools and Haberdashers' Elstree Schools and also with our school sponsor The Haberdashers' Company. We may also receive personal data from this list of partners. Where images and video are concerned, only that captured at joint events will be shared.