

## **PRIVACY POLICY**

### **Contents**

1	Introduction	2
2	The information we collect and when	2
3	How we use your information	2
4	Who we might share your information with	3
5	How we keeping you updated on our products and services	3
6	Your rights over your information	4
7	How long we keep your information for	5
8	Giving your reviews and sharing your thoughts	5
9	Security	5
10	How to contact us	5

# 1 Introduction

---

**Kenmore Park Junior School** is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of parents, pupils, contractors, visitors, governors and all those who work or support us.

We have therefore developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

## 2 The information we collect and when

---

We only collect information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of information that we will collect on you, and you voluntarily provide to us includes:

- Your name
- Address
- Telephone number(s)
- Email address
- Survey responses
- IP address

We may, in further dealings with you, extend this information to include your address, purchases, services used, and subscriptions, records of conversations and agreements and payment transactions.

- You are under no statutory or contractual requirement or obligation to provide us with your personal information; however we require at least the information above in order for us to deal with you as a parent/carer/pupil in an efficient and effective manner.
- The legal basis for processing your data is based on your specific consent/performance of a contract/compliance with a legal obligation/your vital interest/our legitimate interest that we will have requested at the point the information was initially provided, therefore we will not store, process or transfer your data outside the parties detailed above unless we have an appropriate lawful reason to do so.

## 3 How we use your information

---

- To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contacted us about;
- Make available our products and services to you;
- Process your orders;
- Take payment from you or give you a refund;
- Personalise your shopping experience, for example we may provide you with details of products that match a product, which you may have purchased or enquired about previously;
- For statistical analysis and to get feedback from you about our products, websites, mobile apps, and other services and activities. For example, occasionally we may invite you to review a product or service you've bought or used from us. If we do, it's possible that we'll use independent research and feedback providers to act on our behalf;
- To power our security measures and services so you can safely access our website and mobile apps;
- Help us understand more about you as a customer, the products and services you consume, so we can serve you better;
- Contact you about products and services from us;
- Provide you with online advertising and promotions; and
- Help answer your questions and solve any issues you have.

## 4 Who we might share your information with

---

We may share your personal data with other organisations in the following circumstances:

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk); or
- From time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. However, all the information we share will be collected and anonymised, so neither you nor any of your devices can be identified from it.

## 5 How we keep you updated on our products and services

---

We will send you relevant information about our services in a number of ways including by email, but only if you have previously consented to receive these marketing communications. When you register with us we will ask if you would like to receive relevant communications, and you can change your online, over the phone or in writing at any time.

If you wish to amend your marketing preferences, you can do so by email, phone, in person or by writing to us.

## 6 Your rights over your information

---

### **6.1.1 Right to Access Your Personal Information**

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

### **6.1.2 Right to Correction Your Personal Information**

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out below.

### **6.1.3 Right to Stop or Limit Our Processing of Your Data**

You have the right to object to us processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

### **6.1.4 For more information about your privacy rights**

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

## 7 How long we keep your information for

---

We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation and never retain your information for longer than is necessary. Unless otherwise required by law, your data will be stored for a period of 2 years after our last contact with you/some other identifiable action or period, at which point it will be deleted. Some data is retained in order to fulfil statutory duties in relation to exams, safeguarding and other legitimate purposes of the school.

## 8 Giving your reviews and sharing your thoughts

---

When using our websites or mobile applications, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## 9 Security

---

Data security is of great importance to KPJS and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we believe are entitled to be there (by use of passes, key card access and other related technologies);
- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices and stores.
- Never asking you for your passwords;
- Advising you never to enter your account number or password into an email or after following a link from an email.

## 10 How to contact us

---

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: [office@kpjs.harrow.sch.uk](mailto:office@kpjs.harrow.sch.uk)

By post: KPJS, Moorhouse Rd, Kenton, Harrow, HA3 9JA

Thank you for taking the time to read our Privacy Policy.

This Policy was last updated on **11/11/19**.

Ratified by Governors on 5 February 2020