

UPPINGHAM SCHOOL PRIVACY NOTICE

INTRODUCTION

Uppingham School Enterprises Limited is the trading subsidiary of *Uppingham School*, managing the trading activities that take place at the School. This includes *Uppingham School Sports Centre (USSC)*, use of the School's theatre by external companies, the School Shop, and the hire of the School's facilities.

This notice explains how *Uppingham School Enterprises Limited* processes personal data about its customers, members, suppliers, and other interested individuals. This notice applies alongside any other information we may provide about a particular use of personal data, for example if we need to collect specific information via a questionnaire or form.

WHAT TYPES OF PERSONAL DATA DOES THE SCHOOL USE?

During our routine activities, we collect, store and process large quantities of personal data (sometimes sensitive in nature) to effectively manage the various activities occurring at the School.

For example, this could include:

- Names, addresses, telephone numbers, email addresses and other contact information;
- Bank details and other financial information (to allow us to process payments);
- Information about your health and wellbeing (for example, to make reasonable adjustments for individuals with a disability, or if an individual has specific dietary requirements);
- Images of individuals captured by the School's CCTV system; and
- Information captured by the School's access control system at USSC.

HOW DOES THE SCHOOL OBTAIN MY PERSONAL DATA?

Generally, we receive personal data directly from you, this may be via completion of a form or simply in the ordinary course of interaction with the School (for example letting us know about a change of address or updating your contact information). We may occasionally receive personal data from third parties or intermediaries who are administering your booking.

The School reserves the right to carry out credit and identity checks to ascertain whether any person is a 'blocked person' under UK economic sanctions laws, UK anti-money laundering laws, or UK anti-corruption laws.

WHY DOES THE SCHOOL USE PERSONAL DATA?

We need to process a wide range of personal data to facilitate the activities that take place at the School.

For example, we have a legitimate interest to use personal data:

- To administer your membership for using the facilities at USSC
- To arrange bookings, reservations, and classes
- To process payments and for accounting purposes
- To identify when you are on Uppingham School premises

- For security purposes, including CCTV and ANPR cameras, to make sure the School estate is secure;
- To maintain the health and safety of all those who live, work and study on the School estate;
- To safeguard pupils' welfare whilst members of the public are using School facilities;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health & safety) and to comply with its legal obligations and duties of care;

MARKETING

We want to make sure our members and customers know about events, offers, and other products and services we offer that may be of interest. We will always seek your consent before sending you any direct marketing, and you can change your mind about receiving marketing at any time.

If you want to opt out, please email us at enterprises@uppingham.co.uk.

YOUR RIGHTS

Right of access

You have various rights under data protection legislation to access and understand how we store and process your personal data. In some circumstances, you can ask for your personal data to be amended, erased, transferred to another person or organisation, or for us to stop processing your personal data.

The right of access is subject to certain exemptions and limitations, for example when complying with data protection legislation would breach another law. If we are unable to comply with a request for access, we will endeavour to explain the reason why but may not be able to do so in all instances.

When dealing with a request for access, we may be able to respond more quickly to small, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, we may ask you to reconsider, or require a proportionate fee (only as allowed under data protection legislation).

Right of correction or erasure

You have the right to request that any out of date, irrelevant, or inaccurate information is corrected or erased (subject to certain exemptions and limitations).

Right to be forgotten

You may have heard of the 'right to be forgotten'. However, we can sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data, for example where the processing is to meet a legal requirement. All such requests will be considered on their own merits.

Requests that cannot be fulfilled

The School is unable to comply with requests for:

- Information which identifies, or is about, another person;

- Information which is subject to legal privilege (for example, advice given to the School, or documents prepared in connection with a legal action);
- Erasure of personal data where it would place the School in breach of its statutory and regulatory obligations.

Complaints

If you have any comments or queries about this notice, please send an email to enterprises@uppingham.co.uk or call 01572 820800.

If you believe that the School has not complied with this notice or has acted otherwise than in accordance with data protection legislation, you should use the School complaints procedure and should also notify the Bursar. You can also make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

DATA ACCURACY & SECURITY

The School takes all reasonable technical and organisational steps to ensure the security of the personal data it holds about its pupils and their parents. The School securely stores its electronic records on internal databases and servers, protected by appropriate firewalls and anti-virus, and its paper records in secure on-site archives. Access to personal data is restricted to authorised personnel only.

Some of the School's processing activity is carried out on its behalf by approved third parties who may store or transfer personal data outside of the UK (such as mailing houses, IT systems providers, web developers or cloud storage providers). This is always subject to contractual assurance that personal data will be kept securely and only in accordance with the School's specific directions.

The School may update this Privacy Notice from time to time. Where there are substantial changes that may affect your rights, the School will use all reasonable endeavours to notify you directly;