

## **Parents and Pupils Privacy Notice**

The purpose of this Notice is to explain how we handle personal data about parents and pupils at St Martin's School and to explain the rights that they have under data protection law. In this Notice, we refer to this type of information as "**Parent and Pupil Data**". "**St Martin's**" means **Harwil Education Ltd t/a St Martin's School** with registered office at 156a Burnt Oak Broadway, Middlesex, HA8 0AX and with our primary place of business at 22 Goodwyn Avenue, London, NW7 3RG. St Martin's School is also referred to in this Notice as "**we**", "**us**" or "**our**".

We may change this privacy notice at any time. Any updated privacy notice will be made available to parents. The date this privacy notice was last updated appears at the bottom. Questions and comments regarding this privacy notice should be sent to: [info@stmartinmillhill.co.uk](mailto:info@stmartinmillhill.co.uk). Please also see the St Martin's School **Data Protection Policy** which is available on our website and sets out the duties and responsibilities with which St Martin's staff must comply when processing any Parent and Pupil Data.

### **1. HOW AND WHEN WE COLLECT PARENT AND PUPIL DATA**

We collect and process Parent and Pupil Data in the following situations:

- When you sign in or fill in any forms on our website;
- When you attend an open day, parents evening or another of our events;
- When you contact us to ask a question or request information from us in any other way;
- When you participate in any parent satisfaction surveys we conduct;
- During the normal course of the provision of our education services to pupils; and
- When you communicate with us via any social networking websites (such as via our Facebook page).

We may also collect information about you from third party sources, such as from our sub-contractors and service providers (for example other venue providers or providers of sporting activities for pupils).

### **2. WHAT PARENT AND PUPIL DATA DO WE COLLECT**

We may collect and process the following Parent and Pupil Data:

#### **Submitted Information**

We may collect and process the following Parent and Pupil Data which you provide to us:

- contact details (such as your name, address, email address and telephone number);
- demographic information (such as age and/or other information that may identify you as an individual);
- other characteristics (such as ethnicity, language, nationality, and country of birth)
- password (in order to sign in to our website);
- photograph;
- responses to any parent satisfaction surveys (unless these are provided anonymously);
- financial and credit card information; and
- your marketing preferences.

#### **Additional information**

We will also collect the following information about pupils: attendance information (such as sessions attended, number of absences and absence reasons), assessment information,

relevant medical information, special educational needs information, and exclusions / behavioural information.

We will collect and store your payment history with us. If you contact us with a query or a complaint, we may keep a record of the correspondence. At some of our events, we may photograph, record or film onsite activities. In which case, where we have your permission you may be filmed, photographed and/or recorded as part of any such activities.

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with applicable data protection law, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

### **3. PURPOSES FOR PROCESSING PARENT AND PUPIL DATA**

We may process Parent and Pupil Data for the following purposes:

- to provide you with the information you have requested and send you marketing materials;
- to provide our education services and to support pupil learning;
- to monitor and report on pupil progress;
- to provide appropriate pastoral care;
- to assess the quality of our services;
- for market research and to conduct parent satisfaction survey purposes;
- to ensure we provide a good level of service for our parents (and pupils);
- to comply with the law regarding data sharing
- to let you sign in to our website;
- to notify you of any changes to our services and/or other important information about St Martin's;
- for security and fraud prevention; and
- to comply with applicable laws and regulations.

### **4. LEGAL BASIS FOR PROCESSING PARENT AND PUPIL DATA**

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use any Parent and Pupil Data. In almost every case the legal basis will be one of the following:

- **Consent:** For example, where you have provided your consent to receive certain marketing from us. You can withdraw your consent at any time.
- **Our legitimate business interests:** Where it is necessary for us to understand our customers, promote our services and operate effectively as a provider of education services, provided in each case that this is done in a legitimate way which does not unduly affect your privacy and other rights.
- **Performance of a contract with you (or in order to take steps prior to entering into a contract with you):** For example, we need to process certain Parent and Pupil Data in order to provide our education services pursuant to our terms and conditions.
- **Compliance with law:** Where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.

## **5. HOW WE KEEP YOUR PERSONAL INFORMATION**

We will not transfer any Parent and Pupil Data outside of the UK and/or the European Economic Area (EEA). We take steps to ensure that Parent and Pupil Data is retained for only as long as it is necessary for the purpose for which it was collected. After this period it will be deleted or in some cases anonymised. For example, we will keep a record of your payment information for the period necessary for invoicing purposes. We may also keep a record of correspondence with you (for example if you have made a complaint) for as long as is necessary to protect us from a legal claim.

## **6. DISCLOSING YOUR INFORMATION**

We may share Parent and Pupil Data with our suppliers, service providers and business partners where they are helping us to provide our services to you. We will also share Parent and Pupil Data with schools that pupils attend after leaving us, our local authority and in certain cases the Department for Education (DfE)

We may also disclose Parent and Pupil Data to other third parties in the following cases:

- in the event that the business of St Martin's is sold, in which case Parent and Pupil Data may be disclosed to the prospective buyer;
- if we are under a duty to disclose or share Parent and Pupil Data in order to comply with any legal or regulatory obligation or request; or
- to protect the rights, property or safety of us or our parents and pupils, and in order to enforce or apply our terms and conditions (this includes exchanging information with other companies and organisations for the purposes of fraud protection and/or debt collection).

## **7. YOUR RIGHTS**

You have certain rights in relation to your personal information. These include: the right to object to the processing of your information for certain purposes, the right to access your personal information, and the ability to erase, restrict or receive a machine-readable copy of your personal information in certain circumstances. We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions. If you wish to exercise any of these rights please contact us using the contact details below.

You may also have the right to complain to the Information Commissioner's office if you think we have processed your Parent and Pupil Data in a manner which is unlawful or breaches your rights. If you have such concerns we request that you initially contact us (using the contact details below) so that we can investigate, and hopefully resolve, your concerns.

This Notice was last updated on **14<sup>th</sup> June 2023**

**St Martin's School, 22 Goodwyn Avenue, Mill Hill, London NW7 3RG  
020 8959 1965**