

Website Privacy Notice

Document title	Website Privacy Notice		
Owner	Compliance		
Version	1	Status	Final
Last updated	04.03.2024	Last updated by	Lea Millinchip - Compliance Officer
Approved on	27.03.2024	Effective from	01.06.2024
Review Date	01.06.2026		
Purpose	This policy is to explain how and why we hold your information.		
This policy links to:	GDPR Policy		

If you would like this information in another language or format, please speak to the Trust HR Operations team.

Phone: 01543 622433

Email: lea.millinchip@stchads.uk

About this privacy notice

St Chad's Academies Trust and its associated academies are referred to in this notice as the **Trust** or **we**. This notice is to help you understand **how** and **why** the academy trust collects your personal data and what we do with that information. It also explains the decisions that you can make about your personal data. The Trust is responsible for how your personal data is used under data protection law.

Personal data is information about you from which you can be identified (either directly or indirectly).

We are a "controller". This means that we are responsible for deciding **how** and **why** we hold and use personal data about you, and for explaining this clearly to you.

This notice applies to:

- users of our website <https://www.stchadsacademiestrust.co.uk>
- any person who provides services to us - either as an individual or as the employee or representative of a corporate service provider.

It is important that you read this notice, together with any other privacy information or notices we may provide on specific occasions when we are collecting or processing personal data about you. This is to help ensure that you are aware of how and why we are using such information.

This privacy notice should be read in conjunction with our cookies policy <https://www.stchadsacademiestrust.co.uk/cookie-policy/>

Information we collect and process

We collect personal data direct from you when you enquire about our products and services, where we enter into a contract to receive goods or services from you or your employer when you use our site. We may also get information from your employer or colleagues, for example, when your employer asks you to carry out work for us.

We collect further personal data from you during the period of our relationship.

In summary, we use your personal data for the following purposes:

- to carry out obligations arising from any contracts between us and you, with our customers, with suppliers, or with third parties.
- to communicate with you, including to provide you with information, products or services; and
- where it is necessary for our business or activities or our customers' business.

We set out below further information on these purposes and our lawful basis for processing such information.

- **Suppliers, third party business contacts and prospects:**
 - We process names, job titles and business contact information including addresses, telephone numbers and email addresses for you and your employees and representatives and other information for our legitimate interest in maintaining and

managing our relationship with you. If we have a contract with you as an individual, such processing is necessary for the performance of the contract between us, or if you ask us to do something prior to entering into a contract.

- Where you are an employee or representative of a corporate customer or contractor, we process this information for the legitimate interest of performing our contract with your employer.
 - If there is a problem, for example, if we have a complaint about a service you have provided then we have a legitimate interest in using personal data in connection with that complaint, for example, so that we can tell you what happened so that you can put things right.
 - We may perform due diligence on those we work with. This can include in the form of credit checks on companies, including checking photographic identification and proof of address of directors and, in some cases, your shareholders, and verification of the company registration details. We do this to comply with our legal obligations, and as necessary for our legitimate interests of checking that the entities we contract with are financially viable and would not cause us reputational damage.
- **Users of our site:**
 - When you browse our site or purchase products through our site, we may collect information about your preferences and the types of products you are interested in.
 - We also collect technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
 - We also collect information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.
 - These uses are for our legitimate interest in giving you content which is bespoke to you and making sure that our website runs smoothly.
- **Other uses**
 - Regardless of the relationship we have with you, we may need to use your personal data for legal reasons such as fraud prevention and to check that you are complying with our terms and conditions and to enforce our legal rights. We have a legitimate interest in doing this unless we are under a legal obligation.
 - Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.
 - We may contact you about our products and services by email, telephone, post or by text message but we will only do this where we are allowed to under data protection law. If you tell us that you do not want to be contacted for any of these purposes, then we will of course respect that. We will rely on our legitimate interest in marketing our products and services to you unless we need your consent before contacting you for these reasons. If you give us your consent, then you have a right to withdraw that consent at any time. You can withdraw your consent by contacting

the Data protection Officer at DPO@stchads.uk Any use of your personal data before you withdraw consent remains valid.

- We may monitor your use of our IT systems (including our wi-fi) when you visit us. This is to comply with our safeguarding obligations as a Trust which means that our lawful basis is public task.

Sharing your personal data

We may share your personal data with third parties as follows:

- We will share your personal data with third parties where required by law, where necessary for our public tasks, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. This includes sharing personal data with government and with regulators.
- We may also share information if we need to do so in relation to our public tasks (such as our tasks that relate to the provision of education or in relation to looking after our pupils). For example, if a contractor behaved inappropriately around our pupils, we may need to inform relevant third parties such as the police.
- If ever in the future, we are considering restructuring or expanding the Trust, we may share your personal data with the other parties involved and with the relevant professional advisors if this would be necessary for our, or another parties, legitimate interest or for the performance of our public tasks or where we have a legal obligation to do so.
- If we have a legal obligation to do so or for the purposes of fraud protection and credit risk reduction.
- We may share your personal data with third party service providers who act on our behalf such as IT services providers. This notice also covers third party service providers we may engage with.

Overseas transfers

- Your personal data will not be transferred outside of the UK.

How long will we use your personal data for?

Usually, we only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you have a contract with us, then we will typically keep information for six or twelve years after the contract is finished.

In some cases, we may keep your personal data for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. For example, because we provide education to children, we may need to keep information for longer (and in some cases indefinitely) to help us comply with our legal and safeguarding obligations. If you would like further information, please contact us on The Trust Data Protection Officer, DPO@stchads.uk

Your rights in relation to our processing of your personal data

You have the right to:

- object to the processing of your personal data in some cases. You have a right to object if we are using it for direct marketing purposes (e.g., to send you an email about a product). You also have a right to object if the lawful basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest.
- request a copy of the personal data we hold about you.
- request correction of the personal data that we hold about you if it is incorrect or incomplete.
- ask us to delete the information that we hold about you.
- ask us to restrict how we use your personal data in certain circumstances.
- you can request the transfer of your personal data to you or to a third party in a format that can be read by computer in certain circumstances.

If you want to exercise any of your rights, please contact DPO@stchads.uk Please note that these rights do not apply in all cases.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

If you ask us to restrict our use of your personal data, or delete it, we will not be able to provide you with our products or services.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

You have a right to lodge a complaint with the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal data we would kindly ask that you contact us in the first instance, before you speak to the ICO, so that we have an opportunity to put things right.

The Data Protection Officer is the person responsible at our Trust for managing how we look after personal data. The Data Protection Officer can answer any questions which you may have about how we use your personal data.

Our Data Protection Officer can be contacted at DPO@stchads.uk

Schedule 1 Cookie Banner

We use cookies to improve your website experience and to make our website better. This includes using analytics cookies, which help us understand how people use our website. You can read more about the cookies we use by clicking here <https://www.stchadsacademiestrust.co.uk/cookie-policy> With the exception of certain exempt cookies that are needed to make our website work, you can choose which cookies are set.

- Accept all optional cookies
- Reject all optional cookies

Schedule 2 Cookie Policy

- 1.1 Our website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- 1.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 1.3 We use the following cookies:
- 1.3.1 **Session Cookies.** These are only stored temporarily and are deleted from the user's device when the browser is closed.
- 1.3.2 **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- 1.3.3 **Third Party cookies.** Some of our pages feature YouTube videos and feeds from Twitter. These third-party features may use numerous cookies (by default we block these cookies)
- 1.4 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title Cookie Name	Purpose	More information
Realsmart_session	Purpose: Identifies if you are logged into the website. It is a temporary cookie which stores the logged in details of the logged in user- Username, Role, email address.	Cookie expires on logout of website
ga* Google Analytics Cookies	Google Analytics sets this cookie to store and count page views.	St Chads team can monitor website traffic. realsmart does not monitor the website traffic- Session duration is 1 year 1 month 4 days
_ga	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report.	St Chads can monitor website traffic. realsmart does not monitor the website traffic- The cookie stores

		information anonymously and assigns a randomly generated number to recognise unique visitors. Personal data is not stored- Session duration is 1 year 1 month 4 days
--	--	--

- 1.5 Please note that we do not share the information collected by the cookies with any third parties.
- 1.6 If you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.
- 1.7 Except for essential cookies, all cookies will expire after 1 year 1 month 4 days