



GORDONSTOUN SCHOOLS Ltd

ADMISSIONS PRIVACY NOTICE

**Gordonstoun
Elgin
Moray
IV30 5RF**

Tel: 01343 837821

Email: gdpr@gordonstoun.org.uk

Website: www.gordonstoun.org.uk

Approved By

Finance Director

Revised and updated May 2018

All Gordonstoun Schools Ltd policies and procedures are reviewed annually as a minimum

Contents

What is the purpose of this document?
Data protection principles
The kind of information we hold about you
How is your personal information collected?
How we will use information about you
How we will use particularly sensitive personal information
Automated decision-making
Data security
Data retention
Rights of access, correction, erasure and restriction
Right to withdraw consent

What is the purpose of this document?

Gordonstoun Schools Limited, a registered charity registered in Scotland with charity number SC037867 and whose registered office is at c/o Veale Wasborough Vizards, Barnards Inn, 86 Fetter Lane, London, EC4A 1AD, (the “**School**”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you have made an admissions enquiry to the school. It makes you aware of how and why your personal data will be used, namely for the purposes of the admissions, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

In connection with your admissions enquiry with us, we will collect, store, and use the following categories of personal information about you:

- For parents or guardians: the information you have provided on our admissions enquiry form, including name, title, address, telephone numbers, personal email address, and any information you provide on the means testing form, including your personal financial information and any other information you provide voluntarily.
- For prospective pupils: date of birth, gender, education history.
- For both parents/guardians and prospective pupils, any information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs.
- Information about your health, including any medical condition, health and sickness records.
- Information about any special educational needs.

How is your personal information collected?

We collect personal information about prospective pupils from the following sources:

- You, the prospective pupil and parent/ guardian.

- Your current School, if applicable, from whom we collect the following categories of data: educational attainment; any conduct or other relevant behavioural issues with your current school.

How we will use information about you

We will use the personal information we collect about you to:

- Assess the prospective pupil's suitability for attendance at the School.
- Communicate with the parents or guardians about the admissions process.
- Keep records related to our admissions processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to admit the prospective pupil, since it would be beneficial to the School to admit appropriate applicants.

We also need to process your personal information to decide whether to enter into a parental contract with you.

Having received your admissions form, we will then process that information to decide whether you meet the requirements to be considered for admission to the School. If you do, we will decide whether to invite you for a visit and interview (or skype). We will contact your current school to request information relating to your current educational attainment, any conduct or other relevant behavioural issues before confirming your admission.

We will use the information you have already provided us with and any further information you provide us at the interview to decide whether to offer you admission to the School. **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of educational attainment), we will not be able to process your application successfully.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the admissions process, for example whether adjustments need to be made during an interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, to ensure meaningful equal opportunity monitoring and reporting.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need-to-

know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Director of Marketing and Admissions.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of six years after your child has passed school age. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the admissions exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the GDPR@gordonstoun.org.uk.

Right to withdraw consent

When you completed the admissions form, you provided consent to us processing your personal information for the purposes of the admissions exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Director of Marketing and Admissions. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Our Finance Director oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Finance Director. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.