

# Privacy Notice

Enrich Education is committed to protecting the privacy and security of your personal information.

## What is the purpose of this document?

This privacy notice describes how we collect and use personal information about our Parents, Carers, Children and Young People, school staff and other third parties, in accordance with the General Data Protection Regulations (GDPR). This Privacy Notice applies to all Personal Data we process regardless of the media on which that data is stored or whether it relates to past or present Parents, Carers, Children and Young People and school staff or any other Data.

## The Controller

Enrich Education is the “data controller” and responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you or your child which we have grouped together follows:

- **Identity Data** includes first and last name, username or similar identifier, marital status, title, date of birth and gender, relevant medical information.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Attendance information** includes e.g. number of absences and absence reasons, number of temporary exclusions i.e. behavioural information collected for the purposes of extra-curricular clubs and activities.
- **Technical Data** includes internet protocol (IP) address, operating system and platform and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preference.

We do collect **Special Categories of Personal Data** this includes sometimes details about race or ethnicity, religious or philosophical beliefs, and Medical

information relevant for activity sessions

### **If you fail to provide personal data**

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. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - request marketing to be sent to you;
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Schools, academies and other educational institutions we are contracted to deliver a service for, on behalf of you and your child.
  - Identity and Contact Data from publicly available sources.

### **How your personal data is collected and used**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where Parent or Carer have given consent.
- It is necessary to protect a child in an emergency.
- It is necessary to deliver health or social care services
- You have made your information publicly available
- It is necessary to protect public health.
- It is necessary for forecasting, planning or statistical purposes.

- To support pupil learning
- To monitor and report on pupil progress for Children’s University awards programme
- To provide appropriate pastoral care.
- To assess the quality of our service.
- To safeguard pupils for activity sessions and health a safety
- To comply with the law regarding data sharing

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

What we collect	Our Legal basis under GDPR
your contact details including your name, address, email address and/or telephone number;  where appropriate health details  images of pupils engaging in activities	Article 6 (1)(a) Consent  Article 6(1)(b) This is necessary for the performance of a contract  Article 6(1)( c) This is necessary for compliance of a legal obligation
information that you provide by filling in forms at location of sessions or at school  This includes information provided at the time of submitting an enquiry.	Article 6 (1)(a) Consent  Article 6(1)(b) This is necessary for the performance of a contract  Article 6(1)( c) This is necessary for compliance of a legal obligation

<p>if you contact us, we may keep a record of that correspondence, or telephone record</p>	<p>Article 6 (1)(a) Consent</p> <p>Article 6(1)(b) This is necessary for the performance of a contract</p> <p>Article 6(1)( c) This is necessary for compliance of a legal obligation</p>
<p>if you sign up to receive our newsletter, your preferences and any other information provided by you in the course of making such request;</p>	<p>Article 6 (1)(a) Consent</p> <p>Article 6 (1) (f) this is necessary for our legitimate interests</p>

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties, for example; Sub Contractors – namely sports and arts providers who may need register information
- External Third Parties, for example, we share pupil data, names and schools and award levels to National Children’s University’s for the programme we

run with them. We share pupil names, year group and school and award level with an external printer, and photographer who takes pictures on behalf of us and schools at celebration events;

- We may have occasion to share data with Local Authority departments on future programmes, as we have in the past

We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy. This does not occur often but we may share your information:

- In order to stop crime and fraud; or if there are serious risks to the public, our staff or child

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

### **Data retention**

#### **How long will you use my personal data for?**

We will 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.

By law we have to keep basic information for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **Your legal rights**

You have the right to:

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

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data

is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please contact: [info@enricheducationuk.com](mailto:info@enricheducationuk.com) or 0151 489 1123

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **Your data Abroad**

We do not transfer or process data outside of the European Economic Area unless we have specific consent or where the nature of the processing requires it. For

example, because you have chosen to use an email or other communication service which routes data outside of the EEA.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact [info@enricheducationuk.com](mailto:info@enricheducationuk.com) or 0151 489 1123**

### **Who to contact**

We have appointed **Matthew Vaudrey** to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact **Matthew Vaudrey** on [info@enricheducationuk.com](mailto:info@enricheducationuk.com) or **0151 489 1123**. 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.

