



Altus Education Partnership

Website & Cookies Privacy Notice

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Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, student/pupils, and staff.
- 1.2 This notice applies where we are acting as a data controller with respect to the personal data of our website visitors, students/pupils, and staff; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this notice, "we", "us" and "our" refer to *Altus Education Partnership incorporating Rochdale 6th Form College, Edgar Wood Academy and Kingsway Park High School*.

2 How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process.
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and Trust.
- 2.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, date of birth, educational details. The profile data may be processed for the purposes of enabling use of the Trusts services either individually or via its school or college. The legal basis for this processing is the performance of a contract between you and us to support your education.

- 2.5 We may process information contained in any enquiry you submit to us regarding goods and/or services] ("**enquiry data**"). The enquiry data may be processed for the purpose of offering or advising you on educational products and services the Trust provides. The legal basis for this processing is consent.
- 2.6 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you and us.
- 2.7 We may process any of your personal data identified in this notice where necessary for the Trusts or its School or College, to exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights, and the legal rights of others.
- 2.8 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.
- 2.9 Please do not supply any other person's personal data to us unless we prompt you to do so.

3. Providing your personal data to others

- 3.1 We may disclose your personal data to any School or College within the Trust insofar as reasonably necessary for the purposes, and on the legal bases, set out in this notice.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the Trust, to exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 We may disclose *personal data to providers of online services and apps to the Trust*, that have undergone all reasonable security checks to ensure compliance with data protection legislation insofar as reasonably necessary for *us to comply with the contract between you and us for education*.
- 3.4 Financial transactions relating to us are handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds.
- 3.6 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data

where such disclosure is necessary for the Trust, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

4.1 Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

5. Retaining and deleting personal data

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

(a) *Application data shall be retained for the period of time students attend one of the Trust's schools or Colleges, in any event up to the 25th Birthday.*

(b) Where data is provided and this does not result in the Trust entering into a contract for education with you, we will delete the data within 28 days.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention will be dictated by our Records Management Policy or as advised by the relevant legislation.

5.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this notice from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this notice.

6.3 We ask that you check back with this privacy notice from time to time to be aware of any changes that affect you.

7. Your rights

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in

our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access.
- (b) the right to rectification.
- (c) the right to erasure.
- (d) the right to restrict processing.
- (e) the right to object to processing.
- (f) the right to data portability.
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law.
- the processing is for direct marketing purposes; and the personal data have been unlawfully processed.

However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the Trust, exercise or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- you contest the accuracy of the personal data.
- processing is unlawful but you oppose erasure.
- we no longer need the personal data for the purposes of our processing, but you require personal data for the Trust, exercise or defence of legal claims.
- and you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it:

- with your consent; for the Trust, exercise or defence of legal claims.
- for the protection of the rights of another natural or legal person.
- or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- the performance of a task carried out in the public interest or in the exercise of any official authority vested in us.
- or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the Trust, exercise or defence of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

Such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.
- 7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13 You may exercise any of your rights in relation to your personal data by contacting our Data Protection Officer on 01706 769800 or info@altusep.com.

8. About cookies

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

- 9.1 The table below explains the cookies we use and why.

COOKIE	NAME	PURPOSE	MORE INFORMATION
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect	Click here for an overview of privacy at Google

information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Concrete5

CONCRETE5

This cookie is used to record the user's session to allow for personalisation. The cookie is deleted when a user closes their browser

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org .

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout> .

10. Cookies used by our service providers

11.1 Our service providers use cookies, and those cookies may be stored on your computer when you visit our website.

11.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating

to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://policies.google.com/privacy>.

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome).
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox).
- (c) <https://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer)
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website.

12. Our details

12.1 Our website is owned and operated by *us and our selected partners for the school and college websites*.

12.2 We are registered in England and Wales under registration number 10578239, and our registered office is at Altus Education Partnership, College Road, Rochdale, OL12 6HY.

12.4 You can contact us:

- (a) by post, to the postal address given above.
- (b) using our website contact form.

13. Data protection officer

13.1 Our data protection officer's contact details are: 01706 769800 or info@altusep.com.