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## PRIVACY AND COOKIE POLICY

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### BACKGROUND:

Oxford Scholastica Academy understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.oxfordscholastica.com](http://www.oxfordscholastica.com) ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our Site. If you do not accept and agree with this Privacy Policy, you must stop using our Site immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

**"Cookie"** means a small text file placed on your computer or device by our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Details of the Cookies used by our Site are set out in Part 13, below; and

### Information About us

our Site is owned and operated by Oxford Scholastica Academy, a limited Company registered in England under company number 07746591.

### 2. What Does This Policy Cover?

This Privacy Policy applies only to your use of our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can

always contact us to find out more or to ask any questions using the details in Part 14.

- b) The right to access the personal data we hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 14 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 14 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 14.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Data Do We Collect?**

Depending upon your use of our Site, we may collect personal data (please also see Part 13 on our use of Cookies and similar technologies). This personal data can be found on our Contact form, Booking form and Student Information Form (the latter is only relevant for students who attend the summer school). In addition to this, we may collect:

- Payment information;
- IP address;
- Web browser type and version;
- Time zone;
- Operating system;
- A list of URLs starting with a referring site, your activity on our Site, and the site you exit to.

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you,

because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

- Providing and managing your access to our Site;
- Personalising and tailoring your experience on our Site;
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by clicking on the unsubscribe link in an email, or by contacting us on our Contact page).
- Analysing your use of our Site and gathering feedback to enable us to continually improve our Site and your user experience.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email/telephone/text message/post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. You will always have the opportunity to opt-out.

Third Parties whose content appears on our Site may use third-party Cookies, as detailed below in Part 13. Please refer to Part 13 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

## **7. How Long Will You Keep My Personal Data?**

The following factors will be used to determine how long your data is kept:

- Whether there is a legitimate interest to retain the data, for example if you are an alumna/alumnus we may keep information on you so that we can contact them to keep in touch with our Alumni Magazine, Foundation news etc, or so that we have your details on file in case you would like to return to Oxford Scholastica in future years
- Whether there is a legal or insurance requirement to retain your data, for example for existing students who have an injury on the summer school
- Whether consent has been given to contact you for marketing purposes

## **8. How and Where Do You Store or Transfer My Personal Data?**

The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA. Please refer to our Data Protection Policy for further information on this.

## **9. Do You Share My Personal Data?**

We may share your personal data with any member of our group of companies, which

means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your personal information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or with you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Our email or advertising providers, which have their own privacy policies;
- In the event that we sell or buy any business or assets, or sell any companies in our group, we may disclose your personal data to the prospective seller or buyer of such business or assets or companies in our group;
- In the event that we are acquired by a third party, we may transfer personal data to the third party;
- Our legal and other advisers;
- In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. **How Can I Control My Personal Data?**

10.1 In addition to your rights under the GDPR, set out in Part 4, when you submit personal data via our Site, you may be given options to restrict our use of your personal data.

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. **Can I Withhold Information?**

You may access certain areas of our Site without providing any personal data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 13.

## 12. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the addresses shown in Part 14. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is

'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

### 13. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on our Site for analytical and targeting reasons. These Cookies are not integral to the functioning of our Site and your use and experience of our Site will not be impaired by refusing consent to them.

13.1 All Cookies used by and on Our Site are used in accordance with current Cookie Law. We may use some or all of the following types of Cookie:

#### 13.1.1 Strictly Necessary Cookies

A Cookie falls into this category if it is essential to the operation of Our Site, supporting functions such as logging in, your shopping basket, and payment transactions.

#### 13.1.2 Analytics Cookies

It is important for us to understand how you use Our Site, for example, how efficiently you are able to navigate around it, and what features you use. Analytics Cookies enable us to gather this information, helping us to improve Our Site and your experience of it.

#### 13.1.3 Functionality Cookies

Functionality Cookies enable us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.

#### 13.1.4 Targeting Cookies

It is important for us to know when and how often you visit Our Site, and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics Cookies, this information helps us to better understand you and, in turn, to make Our Site and advertising more relevant to your interests.

#### 13.1.5 Third Party Cookies

Third party Cookies are not placed by us; instead, they are placed by third parties that provide services to us and/or to you. Third party Cookies may be used by advertising services to serve up tailored advertising to you on Our Site, or by third parties providing analytics

services to us (these Cookies will work in the same way as analytics Cookies described above).

#### 13.1.6 Persistent Cookies

Any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Site.

#### 13.1.7 Session Cookies

Any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only remain on your computer or device from the point at which you visit Our Site until you close your browser. Session Cookies are deleted when you close your browser.

Certain features of our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that our Site may not work properly if you do so.

Our Site uses analytics services. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our Site is used. This, in turn, enables us to improve our Site and the services offered through it.

The analytics service(s) used by our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable us to continually improve our Site, making it a better and more useful experience for you.

You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## 14. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact us at [www.oxfordscholastica.com/contact-us](http://www.oxfordscholastica.com/contact-us)

## 15. **Changes to this Policy**

We may change this Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.