

# Privacy Policy (Website)

We are committed to protecting and respecting your privacy.

In this statement, "we" means The Harpur Trust (the "Trust"). Bedford School, Bedford Girls' School, Bedford Modern School and Pilgrims Pre-Preparatory School are all part of The Harpur Trust.

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

The Trust is a "controller" (also known as a "data controller"). This means that the Trust is responsible for deciding **how** and **why** we hold and use personal data about you, and for explaining this clearly to you. The schools are all managed by the Trust so the Trust is ultimately responsible for how the schools handle your personal data.

This statement sets out the basis on which any personal data we collect from you, or that you provide to us, through <u>www.harpurtrust.org.uk</u> (our site) will be processed by us.

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, which is included in Schedule 1.

# Information we may collect and process

We collect personal data direct from you when you enquire about our products and services, when we establish you as a customer (for example, when you pay school fees on the website), where we enter into a contract to receive goods or services from you or when you use our site.

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

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site;
- If you contact us, we may keep a record of that correspondence;
- Information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services;
- Information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation);
- Where you access the password protected area of our site, to fill in or retrieve an online grant application, we use the information you provide within this area of the site to assess and process your grant application. The email address and password you enter is to enable you to save and retrieve your grant application; and
- Any other information that you choose to send to us.

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

#### 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 us as follows info@harpurtrust.org.uk. Any use of your personal data before you withdraw consent remains valid.

# 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 it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.
- If ever in the future, we are considering restructuring the charity we may share your personal data with the other parties involved and with the relevant professional advisors. This is for our legitimate interest in ensuring that the charity continues to fulfil its objects.
- 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.
- All our website financial transactions are handled through our payment services providers, World Pay. You can review the World Pay privacy policy at www.worldpay.com. Please check these policies before you submit any personal data to these websites. We will share information with World Pay only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

# 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.

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 are a charity, 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 info@harpurtrust.org.uk.

#### Data security and where we store your personal data

We will take all steps reasonably necessary to ensure that your data is stored and treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### 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 service). 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;
- ask us to send another organisation information that you have provided to us in a format that can be read by computer.

If you want to exercise any of your rights, please contact <u>info@harpurtrust.org.uk</u>. 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 Harpur Trust, is a company limited by guarantee.

Registered Charity Number: 1066861

Registered in England and Wales: Company Number 3475202 Registered Office: Harpur Trust, Pilgrim Centre, Brickhill Drive, Bedford, MK41 7PS

# SCHEDULE 1 – Cookies policy

#### Cookies

We may use cookies (small text files which we [and other website operators] store on your computer when you visit our site) to deliver a better and more personalised interaction. They enable us to recognise you when you return to our site, store information about your preferences, and improve the way your searches are processed. They also enable us to generate statistics about the number of visitors we have and how they use this website and the internet. You can set your browser to reject our cookies if you wish (you should consult your browser help section for details), but this might restrict your use of our website.

The Harpur Trust uses Google Analytics, a web analytics service produce by Google Inc. Google Analytics sets a cookie in order to evaluate visitors' use of the Harpur Trust website. It does not collect personally identifiable information and does not track your movements between different websites.

The cookies used by Google Analytics are:

- \_\_utma
- \_\_utmb
- \_\_utmc
- \_\_utmz

Google stores the information collected by the cookies on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Goole. By using the Harpur Trust website, you consent to the process of data about you by Google in the manner and for the purposes set out above.

For more information set by Google Analytics, including information on how to opt out please go to <a href="http://www.google.co.uk/intl/en/policies/privacy/">http://www.google.co.uk/intl/en/policies/privacy/</a>

You may opt out of Google Analytics on all websites by <u>installing the Google Analytics Opt-out</u> <u>Browser Add-on</u>, or just for this website by clicking on the button below.

#### **Opting out of Google Analytics cookies**

If you click the "Opt out" button below we will delete the Google Analytics cookies and disable Google Analytics on all subsequent pages. To do this we will set another cookie called "CookieManager" that remembers your decision to opt out. You can change this setting at any time by returning to this page. You are **opted in** to Google Analytics cookies.

#### Opt out

### Cookie used on feedback forms

The cookie **ASP.NET\_SessionId** is required for the correct functioning of the feedback forms on the site. This cookie therefore remains enabled.