



Privacy Notice for Third Parties

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Introduction

This Privacy Notice describes how The Leys School and St Faith's School (together part of The Leys and St Faith's Schools Foundation (the "Foundation") and referred to in this Privacy Notice as the "Schools") collect and use personal information relating to third parties in order to successfully carry out their functions, in accordance with UK General Data Protection Regulation (UK GDPR) and any national implementing laws, regulations and secondary legislation ("Data Protection Legislation"). It also explains the decisions third parties can make about their own personal data.

All third parties are encouraged to read this Privacy Notice and the School's Data Protection Policy to understand how and why the Schools process your personal data, including special category data.

Definitions

In this Policy, the following definitions apply:

"Data Protection Legislation" means (i) the UK General Data Protection Regulation ("GDPR") and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the United Kingdom and (ii) any successor legislation to the GDPR.

"Data Controller", *"data subject"* and *"processing"* shall have the same meanings as in the Data Protection Legislation.



"Personal data" means information that we hold about you and which identifies you. This includes information such as your name, date of birth, nationality, address, next of kin, occupation, dietary and medical details, your photograph (including that processed by CCTV) and vehicle details for those authorised to use the Schools' car parks.

"Special categories of personal data" means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

Responsibility for Data Protection

Each School has appointed a Data Compliance Officer, who will deal with all your requests and enquiries concerning the School's use of your personal data and endeavour to ensure that all personal data is processed in compliance with this policy and current data protection legislation.

Under Data Protection Legislation, the Schools are Data Controllers and are jointly registered with the ICO under ICO Registration Number: Z570129X.

The Data Compliance Officers can be contacted as follows:

The Leys School, Trumpington Road, Cambridge, CB2 7AD

Data Compliance Officer: Fiona Oliver

Email: compliance@theleys.net

Telephone: 01223 854861

St Faith's School, Trumpington Road, Cambridge, CB2 8AG

Data Compliance Officer: Simon Holmes

Email: gdpr@stfaiths.co.uk

Telephone: 01223 352073

The Schools have appointed Judicium Consulting Limited as their Data Protection Officer (DPO). Judicium can be contacted directly as follows:

Data Protection Officer: Judicium Consulting Limited

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB

Email: dataservices@judicium.com

Website: www.judiciumeducation.co.uk

Telephone: 0345 548 7000 (Option 1, then 1)

If you have any comments, questions or concerns about the information in this Privacy Notice or your rights, please use the contact details listed above.



How the Schools Collects and Processes Third Party Personal Data

The School collects the following personal data in relation to third parties:

- Name and contact details (For example, email address, telephone number, postal addresses);
- Security and access information (for example, vehicle registration when on school premises, visit logs, identification details, CCTV images)
- If applicable, the organisation/ company name.

Where applicable, the Schools will process special category data. For example, medical information and dietary needs.

Below are some examples of additional data we may collect in relation to third parties:

Supplier Employees, Contractors & Service Providers

- Insurance, qualifications/credentials
- Where required by law or contract, Disclosure and Barring Service information
- Financial/payee details, invoices and purchase orders

Residents and guests

- Disclosure and Barring Service information, as applicable

Leisure Members & Prospective Members

- Membership profile – e.g. age/ date of birth, booking history
- Relevant medical information

Course applicants and attendees (e.g. Lifeguarding, First Aid)

- Application/enrolment data, attendance, assessment results/certifications
- Adjustments/health information

Hirers, Attendees and Visitors

- Ticketing/booking references, seating or access allocation (if applicable), attendance.
- Accessibility/dietary requirements you tell us about for hospitality at events.

Emergency Contacts/ Next of Kin

- Name, relationship to the individual, and contact details (used only for emergency communications).

Special category data

Where applicable, we may process special category data (e.g., health information) strictly for defined purposes such as safeguarding, health and safety, or enabling safe participation in activities (for example, medical details provided by applicants to use The Leys Sports Centre). We do so only where a UK GDPR condition applies.



How the Schools Use Personal information of Third Parties

The Schools needs to process third party personal data for a number of reasons, which include:

- To enable the Schools to run properly and safely;
- To administer and maintain pupil records;
- To provide educational, career and alumni services to pupils;
- To provide educational assistance (such as learning support or additional music lessons);
- To maintain records as required by law (such as health and safety records, insurance records, financial records, statutory reporting records and to abide by UK Visa and Immigration requirements);
- To keep interested parties notified about relevant matters relating to the Schools, such as sports fixtures, exam results, performances and events, guest speakers or other news;
- To market and promote the Schools and their facilities;
- To provide an academic reference or exam results to another educational provider, UCAS or an employer;
- To provide pastoral care and safeguard pupil and staff welfare;
- To organise extra-curricular trips, work experience or activities;
- To obtain professional advice and insurance; and
- To ensure site security (e.g. through use of CCTV).

The Schools' Legal Grounds for Using Personal Data of Third Parties

We will only use your personal information when the law allows us to. In some cases, the Schools need to process personal data to ensure that they comply with their **legal obligations**. We will use your information in the following circumstances:

- Where it is necessary for the purposes of the Schools' **legitimate interests**, such as providing education to pupils and a safe and secure environment, advertising and improving the Schools, enabling us to enforce our rights, monitoring appropriate use of Schools IT and communications systems and facilitating the effective operation of the Schools. Your personal information may also be used for the legitimate interests of others, such as another school.
- Where it is necessary for a **recognised legitimate interest** under the UK GDPR (as amended by the Data (Use and Access) Act 2025).
- Where it is necessary in order to perform our obligations under a **contract** with you.
- Where it is necessary for compliance with a **legal obligation** to which either School is subject, such as reporting a concern to Children's Services, or disclosing your data to third parties such as the Police and Local Authority where we are legally obliged to do so.
- Where it is necessary to protect your or someone else's **vital interests**, for example in an extreme emergency.
- Where it is necessary for the performance of a task carried out in the **public interest**, for example safeguarding and promoting the welfare of children, facilitating the effective operation of the Schools and for providing education services.
- When you have provided us with **consent** to process your personal data.



Special category data which is sensitive personal information, requires higher levels of protection and further justification for collecting, storing and using this type of personal information. The School may process this data in the following circumstances:

- Where you have given **explicit consent**;
- Where it is necessary to protect yours or someone else's **vital interests**;
- Where we need to carry out our legal obligations in line with our data protection policy;
- Where the processing is carried out in the course of our **legitimate activities** where there are **appropriate safeguards** in place;
- Where you have already made the data **manifestly public**;
- Where it is necessary for the purposes of establishing or defending a **legal claim**;
- Where there is a **substantial public interest**;
- Where it is necessary for the **provision of health or social care** or treatment.

Consent

In some circumstances, the Schools may ask for your consent for an additional and specific use of your personal data.

Please be aware however that the Schools may have a lawful reason for processing an individual's personal data which does not require them to have to obtain the individual's consent.

Sharing Data

- Usually, your personal data will remain with the relevant School and only be used by the people who need to know the relevant information. In some circumstances, we may need to share your data with other parties, including 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. There include the following: Local authorities and other public authorities.
- Independent school bodies such as the Independent Schools Inspectorate (ISI) and the Independent Schools Council (ISC).
- Health professionals.
- The Schools' professional advisors as appropriate.
- Government bodies such as The Disclosure & Barring Service.
- Marketing platforms and other IT systems, such as Mailchimp, for example to send newsletters to events enquirers.

We will only share your personal data with other people or organisations where required and where the Schools are assured that your personal data will be kept securely.



Your Rights

Individuals have a number of rights under Data Protection Legislation which can be exercised in certain circumstances. These include your right to:

- **Rectification** - If the data we hold about you is incorrect, you can ask us to correct it. You also have the right to ask us to complete information you think is incomplete;
- **Erasure** - You can ask us to delete the personal data we hold on you in certain circumstances;
- **Access** - You can ask what personal data we hold about you and be provided with a copy. We will also give you extra information, such as why we use the data, where it came from and what types of people/organisations it has been sent to;
- **Object** to processing - You can object to the School processing your personal data in certain circumstances;
- **Restrict** processing - You can ask the School to restrict the use of your personal data in certain circumstances;
- **Data portability** - You can ask the School to send you or another organisation certain types of personal data about you in a commonly-used machine-readable format, in certain circumstances.

Certain information is exempt from the right to access. This includes, but is not limited to, information which identifies other individuals, or information which is subject to legal professional privilege.

Data Accuracy and Security

We take the security of your personal data seriously, internal policies and controls are in place to ensure that your personal data is not lost, accidentally destroyed, misused, disclosed or accessed in an unauthorised way. We limit access to your personal information to those employees, agents, contractors and other third parties who are required to know for the business needs.

We will endeavour to ensure that all personal data held in relation to an individual is up to date and accurate. You can find further details of our security procedures within our Data Security Management Breach Policy and our Information Security Policy, which can be found on our website.

How Long Do the Schools Keep your Personal Data for?

The Schools will retain Personal Data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason and will process your personal data for at least the duration of your involvement with the Schools. In some circumstances, such as for safeguarding and archiving, we will keep the data indefinitely.

We may also keep some of your personal data indefinitely for historical research and archiving purposes.

If you require further information regarding the Schools retention period, please contact the person responsible for data protection at the relevant School for a copy of the School's Data Retention Schedule/Policy.



Privacy Notice Review

This Privacy Notice will be reviewed annually and where appropriate, amended at any time in accordance with any changes in the law or guidance provided by the Information Commissioner's Office (the "ICO"). Where appropriate, the Schools will notify data subjects of those changes in writing (including electronically).

Queries and Complaints

If you have any comments or queries on this Privacy Notice or the way we have handled your personal data, you may contact the person responsible for data protection at the relevant School or the Schools' externally appointed Data Protection Officer (DPO) using the details provided above

If you believe that the School has not complied with data protection law because of the way we have handled your personal data or responded to a request where you have exercised your data subject rights, you can make a complaint to the School. You can use the form provided on our website or contact the School's Data Compliance Officer via email or telephone using the details provided above.

The School will endeavour to acknowledge your complaint within 5 working days of receipt and investigate and inform you of the outcome of your complaint within 30 days of receipt. More complex data protection complaints may take longer for us to resolve but we will keep you informed of progress and provide an expected timeframe.

If you are not satisfied with the outcome of your complaint or if you feel the School has not handled it properly, you may contact the Information Commissioner's Office (ICO) by contacting 0303 123 1113. Further information on making a complaint to the ICO is available here <https://ico.org.uk/make-a-complaint/>.