



Privacy Notice for Leys Enterprises (Cambridge) Limited (including the School Shop)

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Introduction

This Privacy Notice describes how Leys Enterprises (Cambridge) Limited (“Leys Enterprises”), associated with 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 your personal information 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”).

The principal activities of Leys Enterprises, which take place and are located on The Leys School site, include:

- the running of the school shop (“the School Shop”), selling items including but not limited to, school uniform, equipment and other accessories, for both Schools;
- particular lettings; and



- the running of Balgarnie's cafe.

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 may hold about you and which identifies you (if applicable). This includes but is not limited to, information such as your name, address, email address, your photograph (including that processed by CCTV and our visiting signing in and out system, InVentry) and vehicle details for those authorised to use the Schools' car parks.

Responsibility for Data Protection

Leys Enterprises have appointed The Leys School's Data Compliance Officer, who will deal with all your requests and enquiries concerning Leys Enterprises' 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, Leys Enterprises is the Data Controller and is registered with the Information Commissioner's Office (the "ICO") under ICO Registration Number: ZA919493.

The Data Compliance Officer 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

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.

Types of Personal Data Collected and Processed by Leys Enterprises

Examples of the types of Personal Data that Leys Enterprises may collect and/or process, depending on the principal activity, are detailed below and may include, but are not limited to:

Balgarnie's café:

- Full name of employees of The Leys School, who have an employee identification card which they can use to purchase items from the café.



Personal Data that may be collected and/or processed by Leys Enterprises, relating to The School Shop and the organisation of the summer school staff accommodation (if applicable):

- Full name and contact details such as email address and telephone number;
- Company name;
- Identification documents may be viewed if visiting The Leys School;
- Car registration details if on The Leys School site;
- Photographic images, for example through use of CCTV on The Leys School site;

Additional Personal Data that may be collected and/or processed by The School Shop:

- Bank details, if applicable;
- Billing and delivery addresses;
- Pupil clothing sizes, for the purposes of purchasing school uniform;
- Pupils of either Schools' full names and Year Groups.

Personal Data may be collected and processed through Shopify, an e-commerce platform, that helps The School Shop create and manage its online store efficiently. Please refer to [Shopify's Privacy Policy](#) for further information relating to their use of Personal Data.

How Leys Enterprises Use Personal Data

Leys Enterprises is required to process Personal Data for a number of reasons, which include:

- To enable Leys Enterprises to run properly and safely;
- To manage and process any order you make with the School Shop both through the website or in-store;
- To help improve the quality of Leys Enterprises products and services.

Leys Enterprises Legal Grounds for Using Personal Data

We will only use your personal information when the law allows us to. In some cases, Leys Enterprises 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 in order to perform our obligations under a **contract** with you.
- Where it is necessary for compliance with a **legal obligation** to which Leys Enterprises is subject to, such as disclosing your data to third parties, for example, the Police and Local Authority, where we are legally obliged to do so.
- Where it is necessary for the purposes of the Leys Enterprises' **legitimate interests**.
- 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 to protect you 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, facilitating the effective operation of Leys Enterprises and for providing the services, as set out above.



- 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. Leys Enterprises 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, Leys Enterprises may ask for your consent for an additional and specific use of your Personal Data.

Please be aware however that Leys Enterprises 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

The majority of Personal Data collected will remain with Leys Enterprises and The Leys School, and only be available to individuals on a "need to know" basis.

In some circumstances, we may need to share your data with other third 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.

We will only share your Personal Data with other people or organisations where required and where Leys Enterprises are assured that your Personal Data will be kept securely.

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 and other third parties who are required to know for 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 The Leys School's



Data Breach Policy and Information Security Policy, which can be found on The Leys School's website.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. Leys Enterprises is allowed to use automated decision making in limited circumstances. Users of Leys Enterprises will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Your Rights

Individuals have a number of rights under Data Protection law which you can exercise 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;
- **Erase** - 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 Leys Enterprises processing your Personal Data in certain circumstances;
- **Restrict processing** - you can ask Leys Enterprises to restrict the use of your Personal Data in certain circumstances;
- **Data portability** - you can ask Leys Enterprises to send you or another organisation certain types of Personal Data about you in a commonly used machine-readable format, in certain circumstances.
- **Be informed** – you have the right to be informed about our collection and use of your Personal Data.

How Long does Leys Enterprises Keep your Personal Data for?

Leys Enterprises will retain Personal Data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

If you require further information regarding Leys Enterprises data retention period, please contact the Data Compliance Officer.

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 ICO.



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 Data Compliance Officer.

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/>.