

# Privacy Notice

## Introduction

Your privacy is important to Harrow School Enterprises Ltd and this notice is to help you understand how and why we collect personal data about you and what we do with that information. It also explains the decisions that you can make about your own information. This statement complies with the UK Data Protection Act 2018 and with the requirements of the European General Data Protection Regulation. Please read this policy carefully and contact us on the details at the end of this notice if you have any questions or concerns.

This notice applies to data that is collected through the Harrow School Short Courses website, our booking form, registration forms, newsletter subscriptions, photography, and survey questionnaires.

## What is personal data?

Personal data is information that identifies you as an individual. This includes your contact details, next of kin and financial information. CCTV, photos and video recordings of you are also personal data.

## Who are we?

Harrow School Short Courses is a division of Harrow School Enterprises Limited (HSEL). HSEL is a limited company, registered in England & Wales, No. 1617359 and is owned by Harrow School.

## What information do we collect?

### For all courses:

- Information that you provide by registering a student on to a Harrow School Short Course. Please see below for more details of what this includes.
- If you contact us, we will keep a record of that correspondence.
- A survey is sent at the end of each course that we use for feedback purposes. This survey is optional. Some testimonials from it might be used in promotional material alongside the student's name and age if you have given us consent to do so.
- Records of payments. Financial details are collected by third-party financial systems, including Flywire and Realex, unless you have paid by bank transfer, in which case your details will be held securely by the Harrow School accounts team.
- E-mail addresses if you register to our newsletter.

### For summer school in Harrow only:

- Students medical, travel and emergency contact information.
- A copy of a student's passport and visa, if applicable.
- Photographs for use on ID lanyards if permission has been given.

### For online courses only:

- Contact information and recordings of online lessons for students enrolled with Harrow School Short Courses English Online.

### **How is data collected?**

- Data is collected when you fill in our online booking form, and medical, travel, and emergency contact details are collected via E-sign as part of the registration process.
- Passport copies and visas are collected when a student registers on their arrival.
- Survey data will be collected by a third party website such as Google Forms. We will only use a system with a server in the EU.
- Student photographs for summer school are taken upon arrival for ID purposes by our staff.
- Photographs and videos are taken by our professional photographer and videographer during the summer of any student who has given permission for their image to be collected and used. These students are identified by coloured lanyards.
- Recordings of online lessons are taken using our third-party virtual classroom software: ClassIn or Microsoft Teams.

### **How do we use personal information?**

- enrolling students on to a course as per legal obligations
- meeting internal and external audit requirements for the British Council
- personalisation of content, business information and user experience
- student course set up and administration
- delivering marketing communication
- carrying out polls and surveys
- internal research and development purposes
- providing goods and services
- to ensure medical safety
- recordings of online lessons are made so that students can access their lesson again for revision, and are occasionally used for quality assurance and teacher development purposes

### **What legal basis do we have for processing personal data?**

- Consent - for attending courses, you can withdraw a student's consent up until the commencement of the course by cancelling their course. We will then destroy the data relating to that student.
- Contract - to supply an educational course to a student who is under 18.
- Legal obligation - student registration data is held indefinitely in the interest of safeguarding; copies of passports and visas are taken as a legal requirement. Medical information is saved in case of emergencies.

### **When do we share personal data and how is it stored?**

Harrow School Short Courses will treat personal data confidentially but at times may need to disclose or share it when necessary to provide our services or conduct our business operations, as outlined in our purposes for processing. Harrow School Short Courses will inform a subject within 72 hours if we believe that there has been a breach of student or payee data.

- Booking information is collected via a third-party booking system with whom Harrow School Enterprises Ltd has a data protection agreement. This data is stored on a server in the EU.

- Medical data will be shared with a third-party database supplier who Harrow School Enterprises Ltd has a data protection agreement with. This data will be stored on a server in the European Economic Area. If a student is unwell this data may need to be shared with medical professionals.
- Summer School student information is stored on a password restricted database called Class, owned by Infospeed Ltd.
- Online student data is saved on a Harrow School developed student database. This is password restricted.
- Online lessons are recorded via ClassIn or Microsoft Teams and are accessible only to their teacher and managing staff. These are stored for a three-year period.

### **How we secure personal data?**

We have taken the appropriate technical and organisational measures:

- to protect data against accidental loss
- to prevent unauthorised access, use, destruction, or disclosure
- to ensure business continuity and disaster recovery
- to restrict access to personal information
- to conduct privacy impact assessments in accordance with the law and your business policies
- to train staff and contractors on data security
- to manage third party risks, through use of contracts and security reviews

### **How long do we keep your personal data for?**

Personal data kept on a student under the age of 18 who studies with Harrow School Short Courses will be kept archived indefinitely in the interest of safeguarding and as required by law, providing a record of who has attended our courses. Medical data is kept for 25 years as per NHS guidelines. Any other data such as correspondence, survey responses, course reports or copies of certificates will be kept for two years, in line with Harrow School's retention schedule. Recordings of online lessons are kept for three years.

### **Your rights in relation to personal data**

Under current data protection laws, we respect the right of students and payees to access and control their personal data.

- You can request a copy of any personal information at any time.
- You are able to correct data at any time, but as our courses are for students under the age of 18, once they have attended their data will be kept indefinitely as required by law.
- You can withdraw consent for future use of your photos and/or to withdraw consent for the newsletter once registered by contacting us via the details below. To withdraw consent for the newsletter you can also click 'unsubscribe' in an issue. Please note that this will prevent any correspondence from our company reaching you, including information about registered students.
- You can lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>

We aim to respond to any data requests within one month of receipt, as required by the legislation.

### **How to contact us**

You can get in touch if there have questions or concerns about Harrow School Enterprises Ltd privacy practices, your personal information, or if you wish to file a complaint.

To contact us you can:

Email us at:

summerschool@harrowschool.org.uk for Harrow School Short Courses' summer courses at Harrow School

Or at hssconline@harrowschool.org.uk for Harrow School Short Courses Online

+44 (0) 208 872 8000

Email or call the Privacy Officer:

[privacyofficer@harrowschool.org.uk](mailto:privacyofficer@harrowschool.org.uk)