

## **PRIVACY NOTICE**

*We are committed to safeguarding the privacy of our website visitors; 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 Privacy Policy defines how the School will meet its obligations with regards to personal data, as required by the Data Protection Act 2018 (the 'Act') and the EU General Data Protection Regulation (the 'GDPR').*

### **1. Who is responsible for your personal information?**

*Name: Harrow School Short Courses*

*Address: Harrow School Short Courses, Harrow School, 5 High Street, Harrow on the Hill, Middlesex, HA1 3HP, United Kingdom*

*Privacy Officer contact details: [privacyofficer@harrowschool.org.uk](mailto:privacyofficer@harrowschool.org.uk)*

For the purposes of this privacy notice and the relevant legislation, Harrow School Short Courses is the "Data Controller" of personal data.

### **2. What personal information do we collect?**

*We currently collect and process personal data. 'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person.*

*The personal information we collect includes the following:*

- 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 that you provide to us for the purpose of registering with us;*
- information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters;*
- any other information that you choose to send to us.*

*The School may need to process special category personal data (concerning health, ethnicity, religious or philosophical beliefs, genetic or biometric data, sexual orientation) or criminal records information such as criminal convictions and offences.*

*Examples of special category personal data that we process for pupils include, but are not limited to:*

- *Pupils' medical and psychological information;*
- *Biometric data where this is required and for the safety of pupils (such as the door entry system).*

### **3. Why do we collect and use your personal information?**

*We collect and use your data only for the following purposes:*

*a) to fulfil a contractual obligation when we:*

- *supply to you services purchased via the website;*
- *send statements and invoices to you, and collect payments from you;*
- *share with the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling.*

*b) to pursue our legitimate interest and facilitate the conduct of our business when we:*

- *improve your browsing experience by personalising the website;*
- *enable your use of the services available on the website;*
- *send you commercial communications;*
- *send you email notifications which you have specifically requested;*
- *provide third parties with statistical information about our users – but this information will not be used to identify any individual user;*
- *deal with support and general enquiries (including any complaints) made by you relating to the website.*

*c) to comply with legal obligations:*

- *to the extent that we are required to do so by law;*
- *in connection with any legal proceedings or prospective legal proceedings;*
- *in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).*

*d) We may use your personal information for our newsletter and other marketing communications (relating to our business which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology). If you have given your consent, you can withdraw this consent and unsubscribe from the newsletter at any time by using the unsubscribe button at the foot of the newsletter.*

*We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.*

### **5. Your data protection rights**

*Under Data Protection laws you are entitled to exercise the following rights:*

- *Access: you have the right to request access to and/or a copy of your personal information;*

- **Rectification**: you have the right to ask us to modify your personal information if you think it is inaccurate or incomplete. Please do not hesitate to contact us, so that we can keep your personal information up-to-date;
- **Erasure**: you have the right to request the deletion of the personal information we hold about you;
- **Restriction**: you have the right to ask us to limit the processing of your personal information;
- **Data Portability**: you have the right to request that your personal information is provided to you in a machine-readable format and directly transmitted to another controller if the processing is based on consent or contract;
- **Object**: you have the right to object to the processing of your personal information if it is based on legitimate or public interest;
- **Automated decision-making**: you have the right not to be subject to decisions based only on automated processing;
- **Consent**: you can withdraw your consent at any time by contacting us at [enterprises@harrowschool.org.uk](mailto:enterprises@harrowschool.org.uk)  
You may exercise your rights at any time by contacting us at [privacyofficer@harrowschool.org.uk](mailto:privacyofficer@harrowschool.org.uk).

If you need more information on your rights as a data subject, or if you want to lodge a complaint to the Information Commissioner's Office, please visit <https://ico.org.uk/>.

## 6. **How long do we retain your personal data?**

We will only keep your personal information for as long as it is necessary to fulfil the purposes outlined in this Privacy Notice, to comply with legal requirements, prevent fraud and resolve disputes. Where a legal requirement obliges the retention of personal data for a specific minimum period, we will retain data for at least that period. Once your personal information is no longer necessary or upon expiry of a specific retention period, we will dispose of it securely according to our data retention and deletion policies.

If you need more information on the data retention and deletion policy, please contact us at [privacyofficer@harrowschool.org.uk](mailto:privacyofficer@harrowschool.org.uk) or [enterprises@harrowschool.org.uk](mailto:enterprises@harrowschool.org.uk)

## 7. **Do we share your personal information?**

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

This website could contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

## 8. **International transfers**

*Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.*

*Where your personal data is being transferred to countries outside the EEA either by us or by third party service providers acting on our behalf, we will ensure personal data transferred outside of the EEA will do so only using the appropriate transfer mechanisms, ensuring the necessary protections are in place for the security of personal data.*

## **9. Security**

*We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology. Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.*

*You are responsible for keeping your password and user details confidential. We will not ask you for your password.*

## **10. Cookies**

*This site uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information, and provide anonymised tracking data to third party applications like Google Analytics. Please see the Cookie Policy for further information.*

### **Privacy notice updates**

*We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.*

*This notice was last updated in April 2025.*

## **12. How to contact us**

*If you have any questions about this Privacy Notice or our treatment of your personal data, please write or email us at:*

*Harrow School Short Courses, Harrow School, 5 High Street, Harrow on the Hill, Middlesex, HA1 3HP, United Kingdom.*

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

*A company incorporated in England and Wales under company registration number 1617359.*

