

Commercial Activities Privacy Notice

Bedales School
Bedales Services Limited

November 2021

Introduction

This notice is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information.

This notice applies to the services provided by Bedales School or Bedales Services Limited ("**Bedales**" or "**we**"). Bedales is responsible for deciding how it holds and uses personal information about you, and for explaining this clearly to you. To use data protection terminology, Bedales is the "controller" of your information. This notice applies to everyone who uses our services which include:

- the hire and use of our facilities :
 - for short term non-residential hires and for non-sports-related hires (for example, where a hirer is a company hiring our facilities for an away day);
 - for sports hires, where a hirer uses the facilities for sports or physical recreation;
 - for residential hires

In this notice our "services" is a reference to the above and any other services we provide or any other use of our facilities.

Bedales Services is a trading company wholly owned by Bedales School (the **School**).

We share information between the School and Bedales Services because both are heavily involved in organising the commercial activities. This also makes the School a controller of your personal information. Accordingly, this notice applies to both the School and Bedales Services use of personal information in relation to the services.

The School helps with all aspects of the commercial operations. For example, the School helps provide catering for events, so information about dietary requirements is shared to ensure that those being catered for whilst accessing our services are served appropriate food. Bedales may share your personal information in connection with any of the purposes described in this notice.

In addition, the School has its own legal obligations as a charity and a school, which means that the School may also need to use your personal information for its own purposes (for example, reporting to the relevant authorities if something has gone wrong). Further examples of how the School uses your information are set out throughout this notice.

If you have any questions about this notice please contact the Lettings Manager whose contact details are Caz Hulbert / chulbert@bedales.org.uk / 07768 944186. If the Lettings Manager is not available, you can contact the School on 01730 300100 / bedalesreception@bedales.org.uk / Church Road, Steep, Petersfield, Hampshire GU32 2DG in relation to any of the matters set out in this notice.

How we use your information in relation to our services

Our primary reason for using your personal information is to provide our services to you and others.

We collect personal information direct from you when you enquire about our services. If you are a customer then we will collect and process your name, email address, telephone number, address, payment details and information about your requirements so we can provide our services. Using your personal information in this way is necessary for the performance of the contract between us or to take steps prior to entering into a contract.

We collect further information from you during the period of our relationship with you and when you use our services. This applies to both our customers and also to anyone else who uses the services (for example any guest that a customer has brought onto site and children whose parents have paid for them to attend, for example a holiday activity). Our purposes here include:

- To administer your use of the services. For example, we may keep a record of your preferences and interests to enable us to deliver a better service. This is necessary for our legitimate interest in managing what we offer and improving our services.
- Information concerning your suitability to use our services. This is to look after you and other users and in relation to the management of incidents. As part of this we will use information concerning your health, condition, and any disability you may have. We, and the other users of our services, have a legitimate interest in ensuring that the services are used appropriately and safely. In addition, we have a legal obligation under health and safety laws to make sure that our services are used appropriately.
- If you attend one of our holiday clubs / summer schools we have a legitimate interest in processing information concerning your participation, including your progress and attainment. Providing an education is also in the public interest.
- If there is a problem, for example, if you or someone else has made a complaint then we have a legitimate interest in using personal information in connection with that complaint, for example, so that we can find out what happened and put things right.
- We use CCTV in some areas to make sure the site is safe and so that we can investigate if there is a problem. This is in accordance with our legitimate interests. Images captured of you via CCTV will be your personal information. CCTV is not used in private areas such as toilets.
- We will also take photographs of you when you take part in our activities or use our services. The photographs will be used in connection with our publicity, for example, they may appear on our websites, promotional material and on social media. We have a legitimate interest in publicising our activities. We may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time. Please speak to the Lettings Manager if you would like to withdraw any consent that you have given.

Other uses

We have a legitimate interest in using your personal information in other ways as follows:

- Regardless of the relationship we have with you, we may need to use your personal information 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. In addition to legitimate interests, this is also necessary for the performance of any contract between us.
- We may need to use your information in order to protect our interests, and the interests of the School. For example, if you post a comment on a review website then we may provide a response to that comment or contact you directly to discuss your feedback.
- We may share your information with debt recovery suppliers if you do not pay any fees owed to us. In addition to legitimate interests, this is also necessary for the performance of the contract between us.

- We may share information about you with our professional advisors, and our insurers, for example, where there is a serious incident. We may share your personal information with our legal advisors or insurers for the purpose of obtaining legal advice or in connection with actual or contemplated litigation.
- If we sell or buy any business or assets, we may disclose your personal information to the prospective buyer of such business or assets. We and the prospective buyer have a legitimate interest in ensuring that the buyer makes an informed decision.
- In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (for example, if you or they are seriously hurt).
- We may perform due diligence in the form of credit checks on companies, including checking photographic identification and proof of address of directors and, in some cases, your shareholders, and verification of the company registration details. We do this to comply with our legal obligations, and as necessary for our legitimate interests of checking that the entities we contract with are financially viable and would not cause us reputational damage.
- We sometimes use contractors to handle personal information on our behalf. The following are examples:
 - if we use a contractor in connection with the provision of our services, we may share information with them as appropriate. For example if we use outside caterers we may share information about dietary needs and requirements;
 - IT consultants who might access information about you when checking the security of our IT network; and
 - we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.
- Where you are an employee of a customer or contractor, we process your name, job title and business contact details in connection with performing our contract with your employer.

Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

How we use information about children and family members

We have additional obligations because children use our services. This includes children who are pupils at the School.

We may share information about you with others in your family, such as a parent or step-parent. For example, where this is part of our obligation to take care of you or your child, as part of our wider legal and regulatory obligations.

We may share your information with others as set out below where there is a legal obligation to do so:

- With local authorities, the Independent Schools Inspectorate and the Department for Education.
- With the Health and Safety Executive if there has been a health and safety incident.

- With the Charity Commission, for example, in the event of a serious incident. This is because the School is a charity.
- With the police for the prevention and investigation of crime and the prosecution of offenders. This will only be done in specific circumstances to assist the police with their investigations.

Sometimes we will share information as described above even if we do not have a legal obligation to do so. This is for our legitimate interest in ensuring that the services run properly and so that we can benefit from the advice and guidance from the relevant agencies. In many cases, sharing the information will also be in the public interest.

If you are an existing pupil or parent of the School, then we will use your personal information in connection with your (or your child's) education and welfare. For example, if you are a pupil we may tell your teachers if you have done especially well at an activity during a holiday camp or if you have misbehaved when taking part in one of our activities. Further information about how we use personal information of School pupils and parents can be found here: www.bedales.org.uk/privacy

Keeping you updated

We may contact you with marketing material by email, telephone, post or by text message but we will only do this where we are allowed to do so under data protection law. Sometimes we will need your consent first.

If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that. Any use of your information before you withdraw your consent remains valid. Please speak to the Lettings Manager if you would like to withdraw any consent that you have given.

Where will we store your personal information?

Any personal information that you submit to us will be held on secure servers, based within the UK or the European Economic Area (EEA)

Particularly sensitive information

We have extra obligations when we process particularly sensitive information called "special category" personal information under data protection law. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation. We may process "special category" personal information as follows:

- We may need to use information about your health or condition, any disability you may have, or any care that you may need, so that we can make adjustments for example, in respect of seating or dietary requirements or in connection with the use of our services.

Using personal information in this way is in the substantial public interest.

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect our pupils and you are not capable of giving your consent, or where you have already made the information public.

How long will we use your personal information for?

We only retain your personal information for as long as is 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 information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you have a contract with us then we will typically keep information for six years after the contract is finished. However, there are some exceptions to this, notably if you are an existing pupil or parent of the School.

Further information on our retention periods can be found here:
www.bedales.org.uk/bedales/overview/policies

Your rights in relation to our processing of your personal information

You have the following rights:

- **Rectification:** if information we hold about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract; and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:
 - we are using it for direct marketing purposes (for example, to send you marketing information about our services);
 - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest; and
 - if we ever use your information for scientific or historical research purposes or statistical purposes.

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal information 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.

If we delete your personal information or restrict our use of it, we may not be able to provide our services to you.

If you want to exercise any of your rights, you can contact us by email - hmcbrown@bedales.org.uk. 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).

Bedales School is a Company Limited by Guarantee. It is registered in England and Wales: Company Number 00276785 Registered Office: Church Road, Steep, Petersfield, Hampshire GU32 2DG.

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