

What is the purpose of this document?

Clifton Hall School Ltd a company limited by guarantee No. SC040139, an educational charity No. SC009293 and whose registered office is at Newbridge, Edinburgh, EH28 9LQ (the “**School**”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for a place for your son/daughter. It makes you aware of how and why your personal data will be used, namely for the purposes of the application, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

In connection with your application, we will collect, store, and use the following categories of personal information about you:

- For parents or guardians: the information you have provided on our admissions form, including name, title, address, telephone numbers, personal email address(es),
- For prospective pupils: date of birth, gender, education history.
- For both parents/guardians and prospective pupils, any information you provide to us during the application process.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records.
- Information about any special educational needs.

How is your personal information collected?

We collect personal information about prospective pupils from the following sources:

- You, the (parent/guardian of) prospective pupil.
- Your (child's) current School, if applicable, from whom we collect the following categories of data: educational attainment; any conduct or other relevant behavioural issues.

How we will use information about you

We will use the personal information we collect about you to:

- Assess the prospective pupil's current academic attainment levels.
- Communicate about the admissions process.
- Keep records related to our admissions processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to admit the prospective pupil, since it would be beneficial to the School, and to the applicant's family to admit pupils who we can adequately and appropriately support.

We also need to process your personal information to decide whether to enter into a parental contract with you.

Having received your admissions form, we will then process that information to decide whether you meet the requirements to be considered for admission to the School. If you do, and we have a vacancy, we will invite you for an enrolment visit. If we offer you admission to the School, we will then contact your current school to request information relating to your current educational attainment, any conduct or other relevant behavioural issues before confirming your admission.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of educational attainment), we will not be able to process your application successfully.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the admissions process, for example whether adjustments need to be made during an interview.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from Mrs Gillian Finlay.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of twelve months after we have communicated to you our decision about whether to offer admission to the prospective pupil. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the admissions exercise in a fair and transparent way. After this period, we will securely destroy your personal information collected with regards to the application process in accordance with our data retention policy.

We may wish to retain your personal information on file, on the basis that your application is for future academic years. We will seek your explicit consent to retain your personal information until the end of the admissions process.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Mrs Gillian Finlay, gillian.finlay@cliftonhall.org.uk, in writing.

Right to withdraw consent

When you completed the admissions form, you provided consent to us processing your personal information for the purposes of the admissions exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact Mrs Gillian Finlay. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO, Jason Williamson gdpr@cliftonhall.org.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.