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## **1. Statement of intent**

Lokrum Fields is committed to safeguarding the privacy of our website visitors; this policy sets out how we will treat your personal information.

## **2. About our policies**

- 2.1. Our policies have been developed to comply with all relevant legislation and associated guidance. Policies will be updated periodically as necessary.
- 2.2. Our policies are inter-related and are intended to be read, understood and used collectively.
- 2.3. All staff and governors are expected to be familiar with and abide by our policies.

- 2.4. The Office Manager is responsible for ensuring volunteers and visitors are familiar with any policies which are relevant to their involvement and for taking reasonable steps to ensure compliance.
- 2.5. The Headteacher is responsible for ensuring policies are implemented fairly, effectively and consistently.
- 2.6. The Headteacher is responsible for identifying any training needs in relation to our policies. The Office Manager is responsible for arranging the required training. All staff are expected to engage in continuous learning and ongoing training appropriate to their roles.
- 2.7. The effectiveness of our policies and their implementation is monitored by the Governing Body. Unless otherwise stated, the Governing Body reviews each policy annually.
- 2.8. The Governing Body for Lokrum Fields is provided by Governing for Ambition, an independent community interest company. The Governing Body uses its expertise to monitor the performance of Lokrum Fields and to advise the Proprietor of any recommended actions. Responsibilities assigned to the Governing Body are limited to these advisory and accountability functions.
- 2.9. Lokrum Fields is owned by Wider Ambition Ltd, a subsidiary of Wider Plan Ltd. References to the Proprietor mean a Director of Lokrum Fields or a senior representative from Wider Plan with delegated authority.
- 2.10. The Lokrum Fields Senior Leadership Team (SLT) includes the Headteacher, Proprietor, and any member of staff to whom responsibility is temporarily delegated by the Headteacher or Proprietor.
- 2.11. All references to parents within our policies should be interpreted to include parent carers.

### **3. What information do we collect?**

- 3.1. We may collect, store and use the following kinds of personal data:

- 3.1.1. Information about your computer and about your visits to and use of this website, such as your IP address, geographical location, device, internet browser and operating system, how you got to the site, time, day and length of visit and which pages you click on.
- 3.1.2. Information that you provide us with for the purposes of registering with us – see requesting a prospectus at section 4 below;
- 3.1.3. Information that you provide us with for the purpose of subscribing to our website services and email notifications;
- 3.1.4. Any other information that you choose to send to us.

## **4. Cookies**

- 4.1. We use cookies on this website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.
- 4.2. We may send a cookie which may be stored by your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of this website, to improve the website's usability and for marketing purposes. We may also use that information to recognise your computer when you visit our website, and to personalise our website for you. If you choose to refuse our cookies, you may not be able to use all the website elements.
- 4.3. We may use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

## **5. Using your personal data**

5.1. Personal data submitted on this website will be used for the purposes specified in this privacy policy or in relevant parts of the website – see our Policies page for the School's Data Protection Policy.

5.2. We may use your information to:

5.2.1. Administer the website;

5.2.2. Improve your browsing experience by personalising the website;

5.2.3. Enable your use of the services available on the website;

5.2.4. Send you general (non-marketing) commercial communications;

5.2.5. Send you email notifications you have specifically requested;

5.2.6. Send you communications relating to the Admissions process which we think may be of interest to you by post, or, where you have specifically agreed to this, by email or similar technology – you can inform us at any time if you no longer require these communications to be sent by emailing us at [admissions@rugbyschool.net](mailto:admissions@rugbyschool.net);

5.2.7. Provide third parties with statistical information about our users – but this information will not be used to identify any individual user;

5.2.8. Deal with enquiries or complaints made by or about you relating to the website.

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

## **6. Information collection and use**

6.1. In order for you to use this service, we will require you to provide us with certain personally identifiable information, including but not limited to your name, postal address, email address and phone number. In addition, to help us to send you the appropriate information, we also ask for your child's name, gender, date of birth and current school. All the information we collect will only be used in relation to contacting or identifying you and providing the service at your request.

## **7. Other disclosures**

7.1. In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may disclose information about you:

7.1.1. To third-party companies and individuals, service providers, who facilitate our website; host the website on our behalf and who assist us in analysing how our website is used. They are obliged not to disclose or use the information for any other purpose;

7.1.2. To the extent that we are required to do so by law;

7.1.3. In connection with any legal proceedings or prospective legal proceedings; and

7.1.4. 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.

## **8. Security**

8.1. We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

8.2. We will store all the personal information you provide on our secure servers. This website is hosted by Amazon Web Services (AWS) with an EU based data centre located in Dublin, Ireland. Details on AWS's security can be found in the security section of the AWS website.

8.3. Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

8.4. We will not ask you for your password.

## **9. Links to other sites**

9.1. Our site contains links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **10. Changes to our Privacy Policy**

10.1. We may update our Privacy Policy from time to time and we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page which will become effective immediately.

### **11. Contact Us**

11.1. If you have any questions or suggestions about our Privacy Policy or our treatment of your personal data, please write to us by email at [info@widerambition.org](mailto:info@widerambition.org)