

Privacy Statement and Cookies Policy

www.headfort.com

Introduction and Purpose

Headfort School is an independent primary school for boys and girls from the ages of 4 up to 13. It is located in Kells, Co. Meath, Ireland.

The purpose of this Privacy Statement and Cookies Policy is to outline to you how we deal with any personal and non-personal data you provide to us by visiting this [website](#).

We at Headfort School respect your right to privacy and comply with our obligations under the current data protection legislation. This Privacy Statement and Cookies Policy seeks to outline how we deal with any personal or non-personal data which you provide to us while visiting this website (regardless of where you visit it from). It is important therefore that you take the time to read and understand this statement. If there is anything you don't understand **or if you have any queries regarding our Privacy Statement, please email us at mail@headfort.com**.

For the purposes of this Privacy Statement and Cookies Policy, the Board of Management of Headfort School is the Data Controller as understood under current Data Protection Legislation.

By visiting our site you are accepting the terms of this Privacy Statement. If you do not agree with any personal data you provide to us by virtue of visiting our website you should not use our website. We provide additional details about how we collect and use information in connection with our services in our **Headfort Privacy Policy**. [Please Click Here](#).

Type of Information Collected

We retain two types of information from your use of our website:

Personal data. This data identifies you or can be used to identify you.

It can be broken down into the following categories:

- Contact Data: email address, telephone number and address
- Identity Data: first name and last name
- Technical Data: internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data: information about how you use our website and services through Google Analytics
- Marketing and Communications Data: your preferences in receiving marketing from us and your communication preferences.

The collection of this data is only done if you voluntarily submit it to us when you browse our website or by telephone or by emailing us or writing to us directly and where you provide your explicit informed consent to the processing of this data. You may also choose to receive information on our services and up to date news via our Contact Us page or by clicking the 'Request more Information' button on the Education page of our site or by subscribing to the Friends of Headfort School newsletter by giving us your email or other contact details. You therefore will be [opting in](#) to receive

this information. We may use one or more service providers to administer these messages. You may at any time chose to opt out of receiving these email messages by emailing us at mail@headfort.com.

Non Personal data. Like other websites when you browse the site, we collect statistical and other analytical information on an aggregate basis known as aggregated data of all visitors to the site. Non personal data by definition cannot identify you and is not considered personal data in law as this data cannot directly or indirectly identify you.

How we use your personal data and the purpose of such data

Purpose

The use of your personal data will only be done where it is permitted by law- The legal basis for the processing of your personal data will be:

- For the performance of a contract with you
- Where it is required for our legitimate interests (or of a third party)
- Where we are required to comply with a legal or regulatory obligation
- Where we have your consent – the use of consent as a legal basis for processing is generally only used when sending direct marketing communications to you (including an application form) via email or text messaging or by post. You at all times have the right to withdraw your consent to receive such communications and on receipt of any such communication you will be informed of the right to withdraw such consent.

Table: use of your personal data and the legal basis for processing your personal data

<u>Purpose/Activity</u>	<u>Type of data</u>	<u>Lawful basis for processing</u>
To manage our relationship with you which will include: • Notifying you about changes to our terms or privacy policy and recruitment and selection	<ul style="list-style-type: none"> • Identity • Contact • Profile • Application details • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Recruitment and selection processes • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated)
To administer and protect our educational establishment and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our educational establishment, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation of the educational establishment) • Necessary to comply with a legal obligation
To deliver relevant website content to you	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications • Technical 	Necessary for our legitimate interests (to study how you use our services, to develop them, to grow our educational establishment and to inform our marketing strategy)
To use data analytics to improve our	<ul style="list-style-type: none"> • Technical 	Necessary for our legitimate interests (to

<u>Purpose/Activity</u>	<u>Type of data</u>	<u>Lawful basis for processing</u>
website, services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Usage 	define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) and explicit fully informed consent for direct marketing
To make suggestions and recommendations to you about services that may be of interest to you	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	Necessary for our legitimate interests (to develop our services and grow our educational establishment)

Non Personal Data. We use this data in an aggregate form through Google Analytics to:

- Provide a better understanding of what technology is used to access the site and where our visitors come from;
- Learn more about the number of visitors to the site, visitor behaviours and traffic patterns on our site; and
- To help improve the navigation and design of the site and to ensure the content is relevant, up to date and useful to the visitors of the site.

This link provides details of cookies used by Google Analytics

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage#gajs>

Marketing Material

If we ask you for personal data for the purpose of informing you about up to date news and our services you will only receive this information if you have given us your explicit consent by way of the Contact Us page or you subscribe to the Friends of Headfort Newsletter or have received services from us. By filling in the Contact Us page and clicking 'Submit' you are opting in and for those who would like to receive information via the Headfort Newsletter you voluntarily provide your email address to us. You may at any time opt out of receiving any material by emailing us at **mail@headfort.com** You will be informed that you may opt out at any time from this commitment each time you receive any communication from us from the Contact Us page, Friends of Headfort Newsletter or general communication.

Withdrawal of Consent

If you wish to withdraw consent from us processing and holding any personal data under any of the headings above at any time please contact us by email to **mail@headfort.com** and please specify the nature of the processing and holding of personal data for which you want your consent to be withdrawn. This will help us deal with your request more efficiently and quickly. Thank you.

How is your Personal Data collected?

There are different methods to collect your personal data.

Direct Interactions: your identity and contact details may be given by corresponding with us or completing and sending contact forms and application forms. This may be done when you:

- Subscribe to our newsletters or blogs
- Request marketing materials (including an application form) to be sent to you via the Contact Us page
- Provide feedback to us
- Contact us about possible job opportunities (solicited or unsolicited)

Automated Interactions: when you browse our website, we may automatically collect technical data about your browsing actions and habits, and equipment. This data is collected by using cookies (see heading below 'Cookies'), server logs and other equivalent technologies. Technical data may also be collected about you if you visit other sites which use our cookies.

Third Parties: personal data may be received from various third parties such as

- Analytics providers such as Google Analytics
- Social Media pages such as Twitter and LinkedIn
- Mail chimp who send out the Headfort Newsletter on behalf of Headfort School

Personal and Non Personal Data Sharing and Disclosure

Personal Data

Your Personal Data is never shared or disclosed to third parties without your permission, except under conditions explained below.

Headfort School may send your Personal Data to other companies or people (third parties) under any of the following circumstances:

When we have obtained your explicit fully informed consent to share and/or disclose the information;

When we need to share your information to provide the service you have requested;

When you have told us to send the information to other individuals on your behalf for example a third party is required to fulfil a request you have made or contract that you have entered into.

Sharing and disclosure of Personal Data will also occur if we believe in good faith that we are required to do so in order to comply with any applicable law, a summons, search warrant, a court or regulatory order or other statutory instrument or to enforce our Terms and Conditions of Use.

Non-Personal Data

We may provide Non-Personal Data to third parties, where such information is combined with similar information of other users of our site. An example of such data sharing and disclosure could be regarding the number of unique users who visit the site or the activities that visitors to our site engage in while on our Site. The companies or persons to whom this information is sent could include service providers, providers of advertising services, commercial partners, sponsors, researchers, web developers and other similar parties.

Third Party Sites and Social Media

This website may include certain links to third-party websites (for example Vimeo and You Tube), plug-ins and applications. By clicking on those links or enabling those connections will allow these third parties to collect or share data about you; it is likely that they will have their own privacy

policies. For them, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers. Specifically, some of these providers may not be in the same country as you or Headfort School are based. The result of this is that if you proceed to use the services of a third party provider then your personal and non-personal data may become subject to the laws of a country where such service provider is located. As a consequence the use of such data may be different to the country in which you are based. **Please read carefully the privacy policies and statements of these third party providers as these are the policies and statements that will now apply to you.**

Our site may also contain links to and from other websites such as social media sites for example: Twitter and LinkedIn. We have no control over the contents or workings of these sites. These sites (and other sites) may collect information about you if you click on a link and the social media sites may automatically record information about your browsing behaviour every time you visit those sites. Please note that your interaction with these sites are governed by their privacy policies and not by our privacy policy or statement. We do not and cannot control what information these sites can collect. **Please read carefully their privacy policies and statements on a regular basis.** Therefore please review your privacy settings on your social media sites and determine carefully before clicking on any of these links.

Headfort School also uses Mail Chimp a third party service provider for sending out its Headfort Newsletter. **Please read carefully their privacy policy and statement** as this will apply to how they use your personal data.

Data Security

Your personal data is held on secure servers hosted by our contracted hosting provider. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. As a result, no data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your personal data in light of the state of present technological development.

We have put in place appropriate procedures to deal with any suspected personal data breach and will notify you (and the appropriate regulatory body if required) of a breach where we are legally required to do so.

Updating, Verifying, Deleting and Request for Personal Data

You may inform us of any changes in your personal data so that we can amend our records. We will update or delete your personal data as required. If you wish to find out what personal data we hold on you or to have your personal data updated, amended or removed please email us at **mail@headfort.com** and mark it for the attention of Fiona Hesnan Administrative Officer. In most circumstances there is no charge for the supply of this information. Please note that certain data is exempt from disclosure under data protection legislation including certain privileged and confidential information.

If you are not happy with how we implement our Privacy Statement you can contact Fiona Hesnan, at the above email address or you may contact the office of the Data Protection Commission at Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23.

Tel: + 353 (0)761 104 800

Cookies

We may obtain information about how you use the site. This is done using standard technology called a “cookie”. A cookie is a small data file that certain web sites write to your hard drive when you visit them. Cookies are widely used in order to make websites work, or work more efficiently. Some of the cookies used are essential for the site to work. A cookie file can contain information such as a user ID that the site uses to track the pages you have visited, but the only personal information a cookie can contain is information you supply yourself. A cookie cannot read data off your hard drive or read cookie files created by other sites.

Some parts of the site use cookies to understand user traffic patterns. We do this in order to determine the usefulness of our website information to our users and to see how effective our navigational structure is in helping users reach that information. Some of the features and functions of the site may require the use of cookies in order to work properly. If you prefer not to receive cookies while browsing our site, you can set the browser to reject all cookies, or to prompt you to accept or reject individual cookies. You do not need to have cookies turned on to use/navigate through many parts of the site. However, some features of the site may not function in the absence of cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site.

By continuing to use our site, you accept the use of the cookies in accordance with this cookies policy. If you do not accept the uses of these cookies, please delete them as referred to above.

Change of Purpose

Your personal data will only be used for the purposes for which it was collected by us unless we consider that we need to use the personal data for another reason and that reason is compatible with the original purpose. We are happy to explain to you how we understand this processing is compatible with the original purpose.

Disclosures of your Personal Data

This may occur with the below parties for the purposes as explained in the table above:

- External third parties such as service providers acting as processors e.g. Cloud providers or for hosting events.
- International Transfers. Your personal data may be transferred outside the EEA. If this is the case we ensure a similar degree of protection is afforded to such data by using one of the various safeguard mechanisms required under data privacy legislation.

Data Retention

Your personal data shall only be retained for as long as necessary in order to fulfil the purpose for which it was collected which shall include for the purposes for satisfying any accounting, legal or reporting requirements or for the services you requested.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”).
- Request correction of the personal data that we hold about you.

- Request erasure of your personal data. We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (c) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This is called data portability. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email us at mail@headfort.com. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to the Privacy Statement

Headfort School may at any time amend or change this statement without notice in accordance with data protection legislation, so please review it frequently. Any modification to this statement will be posted on this site (www.Headfort.com/privacy statement) so that you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

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Rev.2