



## Privacy Notice for Parents, Legal Guardians, Customers and Students

We take your privacy and that of our students very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information and that of our students. It also explains your rights in relation to your personal information, your rights in relation to our students' information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

### Key terms

It would be helpful to start by explaining some key terms used in this notice:

We, us, our	Oxford Programs Limited trading as Oxford Royale Academy
You, your	The parent or legal guardian of a student, students and/or a customer or potential customer of our services
Our data protection lead	Mr Thomas Whale Senior Marketing and Data Manager <a href="mailto:privacy@oxford-royale.co.uk">privacy@oxford-royale.co.uk</a>
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data, data concerning health, sex life or sexual orientation.

### Personal information we collect about you:

We may collect and use the following personal information about you:

- your name and contact information, including email address(es) and telephone number(s)
- information to enable us to check and verify your identity, eg your date of birth for course enrolment
- your gender information
- location (i.e. your address for correspondence purposes)
- your billing information, including your billing address (enrolled students, agents, and school group leaders)
- your contact history
- information about how you use our website, communication and other systems



- medical and dietary information (enrolled students, agents, and school group leaders)
- educational information, eg school or university (enrolled students only)
- your responses to surveys, competitions and promotions

This personal information is required to provide services to you and to any student(s) that you register with us (or to provide information about services you may be interested in receiving from us). If you do not provide personal information we ask for, it may delay or prevent us from providing information or services to you.

### **How your personal information is collected**

We collect most of this personal information directly from you—in person, by telephone, text or email, via application or enrolment documentation you may complete, and/or via our website. However, we may also collect information:

- from cookies on our website—for more information on our use of cookies, please see our [Cookie Policy](#)
- via our IT systems, eg:
  - door entry systems and reception logs;
  - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;
  - from enquiries you might make on our website - for more information on our collection of data via our website, please see our [Cookie Policy](#)

### **How and why we use your personal information**

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.



The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>Purpose for which we use your personal information</b>	<b>Our reasons</b>
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Oxford Royale Academy	For our legitimate interests or those of a third party, ie to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulators	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, service range or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations



	For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing courses and new ones
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: —existing and former students; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests, ie to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, ie to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, eg for the audit of our accounts	For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, such as medical information, which we will only process with your explicit consent.

### **Promotional communications**

We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including promotions or new services.

We have a legitimate interest in processing your personal information for promotional purposes (see above ‘**How and why we use your personal information**’). This means we do not usually need your consent to send you relevant promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:



- contacting us at [newsletter@oxford-royale.co.uk](mailto:newsletter@oxford-royale.co.uk).
- using the 'unsubscribe' link in emails or 'STOP' number in texts

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

### **Who we share your personal information with**

We routinely share personal information with:

- third parties we use to help deliver our services to you, eg IT service providers, mailing houses, suppliers of personalised materials provided to students who attend one of our programmes (for example, a name or ID badge), and external catering companies;
- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- credit reference agencies;
- our insurers and brokers;
- our bank(s) and payment service provider(s);
- partner colleges and institutions that provide accommodation or teaching facilities for our courses.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, eg in relation to the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

### **Where your personal information is held**

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your personal information with**').

Some of these third parties may be based outside the European Economic Area. For more



information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the EEA'**.

### **How long your personal information will be kept**

We will keep your personal information while we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to safeguard our students;
- to keep records of academic performance / course attendance;
- to keep records required by law;
- to keep in touch with you at your request.

We will not retain your personal information for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal information and in different circumstances (including, for example, if you or a student you register are involved in a disciplinary or medical incident during your or their time with us). Further information on this is available in our Data Retention Policy, available on request by emailing [privacy@oxford-royale.co.uk](mailto:privacy@oxford-royale.co.uk).

When it is no longer necessary to retain your personal information, we will delete, anonymise or pseudonymise it.

### **Transferring your personal information out of the EEA**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), eg:

- with your and our service providers located outside the EEA;
- if you are based outside the EEA;

Currently, we transfer data to India and to the United States of America. These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Sometimes these countries will have data protection regimes in respect of which the European Union has made an "adequacy decision", or the transferees will have entered into an approved data protection agreement such as the US-EU Privacy Shield. In other circumstances our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses, or for further information, please email the Data Protection Lead on [privacy@oxford-royale.co.uk](mailto:privacy@oxford-royale.co.uk).



## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us —see below: **'How to contact us'**; and
- let us have enough information to identify you (eg your full name, address and previous order reference numbers)
- tell us what right you wish to exercise and the information to which your request relates

## Rights to student data

Under English law once people reach the age of 13 they have the right to consent to the use of their data for online services. Young people who are able to understand the concepts involved in data regulation and its corresponding rights also have the right to consent or object to the



exercise of rights over their data by their parents or carers. If therefore you wish to access a student's data or exercise another right over that data we will first assess the student's understanding of the relevant concepts and may then need to seek the student's consent.

### **Keeping your personal information secure**

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <https://www.getsafeonline.org/>.

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in any European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: +44 303 123 1113.

### **Changes to this privacy notice**

This privacy notice was published on 24 May 2018 and last updated on 1 May 2019.

We may change this privacy notice from time to time—when we do we will inform you via email.



**Oxford Royale Academy**  
inspirational cultural and academic courses

## **How to contact us**

Please contact us by post, email or telephone if you have any questions about this privacy notice or the information we hold about you.

Our contact details are shown below:

**Oxford Royale Academy**  
**Yarnton Manor**  
**Church Lane, Yarnton**  
**Oxfordshire, OX5 1PY**  
**UNITED KINGDOM**

[privacy@oxford-royale.co.uk](mailto:privacy@oxford-royale.co.uk) +44 (0) 845 130 60 21

## **Do you need extra help?**

If you would like this notice in another format (for example audio, large print, braille) please contact us (see '**How to contact us**' above).