

# PURPOSE OF THIS PRIVACY POLICY

We are committed to protecting your personal information and to being transparent about the information we hold about you. Using personal information allows us to develop a better understanding of our students, and in turn to ensure their safety while on campus.

The purpose of this policy is to give you a clear explanation about how we collect and process your/your child's personal information through your use of our application form.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information. This privacy policy supplements our other policies and is not intended to override them.

We will use the information that we collect about you in accordance with:

- The Data Protection Act 1998
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- The EU General Data Protection Regulation (Regulation EU 2016/679), ('GDPR') which becomes effective from 25 May 2018

This policy explains:

1. Who we are
2. Information we may collect about you
3. How we collect your data
4. How we may use your information
5. Disclosure of your details to third parties
6. Security of your personal information

7. Data retention
8. Your legal rights
9. Notification of changes to our privacy policy
10. Contact details and further information

If you have any questions, please contact Jacques Morgulis at Hua Hsia Chinese School using the contact details at the end of this policy.

## 1. WHO WE ARE

Hua Hsia Chinese School is a London based independent weekend School, register number 6306575.

## 2. INFORMATION WE MAY COLLECT ABOUT YOU

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed, i.e. anonymous data.

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, 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 our website.

- **Usage Data** includes information about how you use our website, products and services.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal information**

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide classes to your child/ren). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **Users under 18**

We understand that people aged under 18 may use this website. To request to see our safeguarding policy, please contact us using the contact details at the end of this policy.

## **3. HOW WE COLLECT YOUR DATA**

We collect different information about you in a number of ways:

### **Information you give us**

When you fill out our enrolment form we will store the personal information you give to us such as your name, email address, postal address, telephone number and child's details. We will also keep a record of your purchases.

### **Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

### **Information from third parties**

We occasionally receive information about you from third parties as set out below:

1. Analytics providers such as Google
2. Advertising networks such as Facebook
3. Search information providers such as Google AdWords

## **4. HOW WE MAY USE YOUR INFORMATION**

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

- Where we have your explicit consent before using your personal information in that specific situation.

## Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your invoice including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about different services we offer (holiday camps) (b) Asking you to leave a testimonial.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and market our services)

To enable you to partake in competitions	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to host competitions related to our School)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing and communications with you, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful, and never excessive. To do

this, we use data that we have stored about you, such as which classes you have booked for in the past, as well as any contact preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by email. In the case of email, we operate an opt out basis, if at any time you wish to stop receiving emails from us regarding the School or your child/ren's classes you will need to let us know – we will then remove your email address from the mailing list.

As part of our service to you, we may contact you by email or telephone to provide essential information related to your child/children's classes and the School.

### **Fundraising communications**

Hua Hsia Chinese School is linked with Friends of Hua Hsia which is a registered charity, charity number 1100876.

Under our legitimate organisational interest, we may contact you by email to inform of you fundraising events taking part in the School. This contact will not be more frequent than once per month and you are able to opt out at any time by using the contact details at the end of this policy.

## **5. DISCLOSURE OF YOUR DETAILS TO THIRD PARTIES**

There is a certain circumstance under which we may disclose your personal information to a third party. This is as follows:

- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

We do not sell personal details to third parties for any purpose.

## **6. SECURITY OF YOUR PERSONAL INFORMATION**

### **Security of your personal information**

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same and that they will only process your personal information on our instructions. The third parties will also be subject to a duty of confidentiality.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to GDPR.

## **7. DATA RETENTION**

We will only retain your personal data for as long as 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 data, we consider the amount, nature, and sensitivity of the personal data, the

potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **8. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as follows:-

### a) Request access to your personal information

You have a right to request a copy of the personal information that we hold about you. Please use the contact details at the end of this policy if you would like to exercise this right, or any of the rights listed below. If you are a European citizen and consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, i.e. the Information Commissioner's Office.

### b) Request correction of your personal information

You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide to us.

### c) Request erasure of your personal information

You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with

your request for erasure if there are specific legal reasons- which will be notified to you at the time of your request.

#### d) Object to processing of your personal information

You have the right to object to the 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

#### e) Request restriction of processing your personal information

You have the right to request that we suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

#### f) Request transfer of your personal information

You have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please 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.

#### g) Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. 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.

Please also note the following:-

#### **No fee usually required**

You will not have to pay a fee to access your personal information (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.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

## **Time limit to respond**

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.

## **9. NOTIFICATION OF CHANGES TO OUR PRIVACY POLICY**

This privacy policy may change from time to time. We will always communicate any changes to our parents and customers where we have accurate contact details and where they would expect to receive communications from Hua Hsia Chinese School. Please visit this section of our website periodically in order to keep up to date with changes in our privacy policy.

## **10. CONTACT DETAILS AND FURTHER INFORMATION**

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Please also contact us if you have any questions about the information we hold about you, or to change your contact preferences with us:

Email us: [secretary@huahsia-chinese.org.uk](mailto:secretary@huahsia-chinese.org.uk)

Call us: 020 8201 0698

Write to us:

School Manager  
Hua Hsia Chinese School  
98 The Broadway  
London  
NW7 3TB

Privacy policy effective from 21 May 2018