

# COGNITA

## COGNITA SCHOOLS LIMITED GENERAL PRIVACY NOTICE

### 1 INTRODUCTION

- 1.1 We are committed to protecting and respecting your privacy. Cognita is a group of independent schools. In this privacy notice, references to “we”, “us”, “our”, or “Cognita” is a reference to Cognita Schools Limited and our schools.
- 1.2 This privacy notice deals with any personal data we process which is not covered in our parent and pupil privacy notices. It sets out the basis on which any personal data we collect from you is handled by us in the course of our relationship with you. For example, this notice applies to you if you are a potential recruit, next of kin, supplier, or potential supplier, alumni, or prospective pupil or parent of a prospective pupil.
- 1.3 For prospective parents and pupils, please also see our parent and pupil privacy notices. These are also available on our website.
- 1.4 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.5 For the purposes of the General Data Protection Regulation 2016/679 (“GDPR”), we are the data controller and our School Support Centre is at 5 & 7 Diamond Court, Opal Drive, Eastlake Park, Milton Keynes MK15 0DU. Our ICO registration number is Z9688459.
- 1.6 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

### 2 INFORMATION WE COLLECT ABOUT YOU

#### Information you give us

- 2.1 You may give us personal data about you, in a number of ways; these include:
- 2.1.1 using, visiting or interacting with our website (such as filling out forms or registering on our website);
  - 2.1.2 visiting our offices or schools;
  - 2.1.3 during an interview or meeting;
  - 2.1.4 corresponding with us by phone, e-mail or post; and
  - 2.1.5 sending information directly to us, or providing information as requested by us and/or which is necessary from time to time (for example providing your job application form, CV or business card).
- 2.2 The information you give us may include the following information about you:
- 2.2.1 full name;

- 2.2.2 photograph;
- 2.2.3 marital status;
- 2.2.4 National Insurance number;
- 2.2.5 salary;
- 2.2.6 employment history;
- 2.2.7 contact details (including home address, e-mail address, and mobile, home and/or work phone number);
- 2.2.8 financial information (for example payee details);
- 2.2.9 passport details, nationality and other information relating to immigration status;
- 2.2.10 previous educational records and achievements;
- 2.2.11 information received via safeguarding forms when visiting a site;
- 2.2.12 information about your physical or mental health, or disability status, to ensure your health and safety at our sites and to assess your fitness to work and to provide appropriate adjustments;
- 2.2.13 information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and
- 2.2.14 references (as an applicant or potential supplier).

**Technical information we collect about you when you visit our website**

- 2.3 With regard to each of your visits to our website we may automatically collect the following information:
  - 2.3.1 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
  - 2.3.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.
- 2.4 Our website may contain links to and from the websites of our partner networks, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this notice and may have their own privacy notices. We do not accept any responsibility or liability for these notices. Please check these third party notices before you submit any personal data to these websites.

**Information we receive from other sources**

2.5 We may be working closely with third parties (including, for example, recruitment agents, previous employers, medical practitioners, education authorities, business partners, payment and delivery services) and may receive information about you from them.

2.6 We may also use CCTV footage to ensure our sites are safe. We may receive information about you if you use any of the other websites we operate or the other services we provide.

### **3 COOKIES**

3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy which is made available on our website.

### **4 CONTACT US**

4.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to our Data Protection Officer at DPO@Cognita.com or 3<sup>rd</sup> Floor, 41-42 Eastcastle Street, London, W1W 8DY.

### **5 USES MADE OF THE INFORMATION**

#### **Information you give to us**

5.1 We will use the information you give to us to pursue the following legitimate interests (as applicable to our relationship with you):

5.1.1 promote the objects and interest of our schools, ensure the most efficient management of the schools and ensure that the schools' legal obligations are adhered to;

5.1.2 to store this information on our management information system/s;

5.1.3 to enforce our terms of use with you or any other contract we may have with you;

5.1.4 for the purposes of recruitment;

5.1.5 to enable us to receive your services; and

5.1.6 where you have attended one of our schools, to keep you up to date with key school news and upcoming events.

5.2 In order to pursue the legitimate interests referred to in paragraphs 5.1.1 and 5.1.6, we rely on software applications and other technology to process personal data about you. These include the school's management information system and our HR and finance systems. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your information is kept secure. For further information on the kind of technology we use, please contact our Data Protection Officer (see paragraph 4).

5.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us or receive the services we request from you. For example, we

may be recruiting you for a role at Cognita, or engaging you to supply us with services and will use personal data where necessary to recruit you or receive your services.

5.4 In addition, we may be required by law to do the following (which is not an exhaustive list):

5.4.1 keep an accounting record of payment; and

5.4.2 keep a record to evidence fair recruitment processes.

5.5 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Officer (see paragraph 4).

#### **Information we collect about you from our website**

5.6 We will use this information for the following legitimate interests:

5.6.1 to contact you if you have made an enquiry to one of our schools via our online enquiry form and/or to inform you about available places in the future;

5.6.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

5.6.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;

5.6.4 as part of our efforts to keep our website safe and secure.

#### **Information we receive from other sources**

5.7 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a reference from a previous employer relating to you, which may impact a recruitment decision.

#### **When we disclose information**

5.8 In order to pursue one of the legitimate interests set out above, we may share your personal information with:

5.8.1 Cognita School Support Centre;

5.8.2 A member of the Cognita group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;

5.8.3 local authorities, education authorities (for example, Ofsted), the Department for Education, SEN co-ordinators, social services or the police where we have reason to believe there are safeguarding concerns in respect of a child;

5.8.4 business partners, professional advisors, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

5.9 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our contract (between us and you) and other agreements.

#### **Where we need to get your consent**

5.10 We will not market services to you (other than in accordance with paragraph 5.1.6 above) without your consent and you have the right to ask us not to use your contact details for marketing. Please contact [DPO@Cognita.com](mailto:DPO@Cognita.com) if you no longer wish to be contacted by us.

## **6 TRANSMISSION OF PERSONAL INFORMATION OUTSIDE THE EEA**

6.1 The data that we process about you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). We try to limit this where possible but it may be necessary where, for example, one of our suppliers has a data centre outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice and that the appropriate legal safeguards are in place prior to the transfer, for example ensuring that any contracts between us and the recipient of the information have EU-approved standard data protection clauses, or the country we are transferring the data to is deemed by the EU Commission as an adequate country.

## **7 YOUR RIGHTS**

7.1 Under the GDPR, you have the following rights:

7.1.1 **Right to correction.** You have the right to have inaccurate personal data about you rectified.

7.1.2 **The right to erasure.** You have the right to request that we delete your personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details); (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.

7.1.3 **Right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details).

7.1.4 **Right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third party organisation.

7.1.5 **Right to object.** You have the right to raise an objection to any of our processing in paragraphs 5.1 and 5.2. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.

- 7.1.6 **Right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.
- 7.1.7 **Right to complain to the ICO.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office.
- 7.1.8 **Right to request access.** You have the right to access personal data we hold about you. Please contact our Data Protection Officer if you wish to do so at [DPO@Cognita.com](mailto:DPO@Cognita.com).

## **8 HOW LONG WE KEEP PERSONAL INFORMATION**

- 8.1 We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.
- 8.2 We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection Officer (see paragraph 4).

## **9 USE OF OUR WEBSITE**

- 9.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **10 CHANGES TO OUR PRIVACY NOTICE**

- 10.1 Any changes we make to this privacy notice in the future will be posted on our website and, where possible and appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

**Dated 25 May 2018**