

## The Consortium Academy Trust -

### Website Data Protection Statement

This Data Protection Statement (“**this Statement**”) explains our use of information collected via our websites, including how such information will be used, how we determine for how long we keep it and what your related rights are.

#### 1. Who are we?

1.1 We are The Consortium Academy Trust (registered company number 07665828). Our registered office and address for correspondence is at Cottingham High School, Harland Way, Cottingham, East Riding of Yorkshire, England, HU16 5PX. As at 02 July 2019 we operate the following academies: Croxby Primary, Cottingham High, Hessle Academy (Hessle High and Penshurst Primary), Holderness, Howden and Wolfreton.

1.2 We are committed to ensuring that all personal information we hold is treated properly and in accordance with applicable data protection legislation. We are registered as a data controller with the Information Commissioner’s Office and our registration number is ZA359251. In accordance with applicable data protection legislation, we are required to explain to you how we will treat any personal data which we collect about you.

1.3 This Statement applies to anybody who submits information to us via any of our websites:

- a) [www.cottinghamhigh.net](http://www.cottinghamhigh.net)
- b) [www.croxbyprimary.co.uk](http://www.croxbyprimary.co.uk)
- c) [www.the-consortium.org](http://www.the-consortium.org)
- d) [www.thehessleacademy.co.uk](http://www.thehessleacademy.co.uk)
- e) [www.holderness.academy](http://www.holderness.academy)
- f) [www.howdenschool.net](http://www.howdenschool.net)
- g) [www.wolfreton.co.uk](http://www.wolfreton.co.uk)
- h) [www.consortiumtrust.co.uk](http://www.consortiumtrust.co.uk)

1.4 You have the right to lodge a complaint with the Information Commissioner’s Office if you have any concerns with regard to the way in which we process your personal information. We would however appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.5 Please note that if you apply to The Consortium Sixth Form partnership, we will collect additional information from you in connection with your application. Such information will be processed in accordance with our related Data Protection Statement

1.6 You warrant that any information you supply to us is accurate and up to date (whether or not the information is about you), that you will inform us if any information that we hold about you requires updating, and that if you submit a third party’s details to us (including but not limited to via any of our websites) you have that third party’s permission or another legal justification for doing so.

#### 2. What information do we collect and how do we use it?

- 2.1 It is possible to visit and browse some sections of our websites without being required to tell us who you are or reveal any information about you.
- 2.2 We may collect information from you when you interact with any of our websites or when you correspond with us by telephone, email or otherwise. This may include your name, contact details and information connected with any related enquiry. We may use this information where necessary for our legitimate interests (so long as our interests are not overridden by the impact on you), for example in responding to any related enquiry.
- 2.3 We may also collect information about where you are on the internet (e.g. the URL you came from, IP address and domain names like .co.uk and .com), your browser type, the country where your computer is located, the parts of our websites that were viewed during your visit and any search terms that you entered on any of our websites. We may collect this information even if you do not submit any information to us using any of our websites, and will use it for our legitimate interests in administering and improving our websites, for internal operations (including troubleshooting, analysis of how our websites are used, testing, research and statistical purposes) and as part of our efforts to keep our websites safe and secure.

### **3. To whom may we disclose information?**

We may disclose information relating to you:

- 3.1 With third parties who are directly involved in dealing with any request, enquiry, complaint or other correspondence submitted by you which the information is relevant to;
- 3.2 With third parties who are providing us with professional advice which the information is relevant to where necessary for our legitimate interests and permitted by law;
- 3.3 Where we are legally required to do so;
- 3.4 In connection with criminal investigations, legal proceedings or prospective legal proceedings which the information is relevant to where necessary for the related legitimate interests of us or a third party and permitted by law;
- 3.5 In order to establish, exercise or defend our legal rights where necessary for our legitimate interests and permitted by law; and
- 3.6 Where we have stated or informed you otherwise.

### **4. Your rights**

- 4.1 You have a legal right to see a copy of the personal information that we keep about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:
  - (a) request that we erase any personal information held about you;
  - (b) restrict our processing of your personal information (for example to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);

- (c) data portability (i.e. to request the transfer of personal information to a third party); and
- (d) object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) or the processing is carried out on the basis that it is necessary for the performance of a task in the public interest.

4.2 Requests in respect of the above should be made in writing to the Data Protection Officer, The Consortium Academy Trust, c/o Cottingham High School, Harland Way, Cottingham, East Riding of Yorkshire, England, HU16 5PX or via email at dpo@consortiumtrust.co.uk. Please contact the same address if you have any reason to believe that information we hold about you is inaccurate. We will respond to your request as soon as possible and, in any event, within one month from the date of receiving the request. Please note that we may, where legally permitted, reject any such request or limit the scope of our response (e.g. if, in the circumstances, the right does not apply to you).

4.3 In accordance with applicable data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity and rights before complying with any request of a nature described in section 4.1 above.

4.4 You will not generally have to pay a fee to exercise any of your rights described in section 4.1 above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively we may refuse to comply with your request in such circumstances.

## **5. Security and Retention**

5.1 We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to such personal information to those employees, agents, contractors and other third parties who have a valid need to know that information. However, the internet is global and no data transmitted via the internet can be guaranteed by us to be completely secure during transmission. We cannot guarantee the security of any information that you disclose online and we will not be responsible for any breach of security unless due to our negligence or wilful default. It is possible that the information that you provide to us will be temporarily transferred via a route outside the European Economic Area as it passes between us.

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

5.3 Information submitted via any of our websites for a purpose described in this Statement will be retained for a reasonable period having regard to the relevant purpose for the information being used, following which it will be securely destroyed.

5.4 Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time that we retain personal data; consider the purpose or purposes for which we hold the personal data in deciding whether (and for how long) to retain it; securely delete personal data that is no longer needed for such purpose or purposes; and update, archive or securely delete information if it goes out of date.

## 6. How will you know if we make any changes to this Statement?

6.1 This Statement does not form part of any contract.

6.2 We may amend this Statement at any time. If we make any changes to the way in which we use information submitted to any of our websites we will post a related update on each of our websites' home page (please see section 1.3 above).

## 7. What about third party websites?

7.1 Our websites may contain links to other websites which are outside our control and are not covered by this Statement. If you access other websites using the links provided the operators of those websites may collect personal data from you which will be used in accordance with their respective privacy policies which you should read. We are not liable for the practices of such third party website operators in respect of your personal information.

7.2 You acknowledge that any information using any of our social media facilities (such as any of our academies' Facebook, Twitter or YouTube pages) will be viewable by anybody that visits those facilities and that such information is also subject to the relevant provider's privacy policy. You are advised to consult each such privacy policy to see how they will use your data.

## 8. Contact

If you have any questions about this Statement or our use of personal information, please contact our Data Protection Officer by email at [dpo@consortiumtrust.co.uk](mailto:dpo@consortiumtrust.co.uk) or by writing to the Data Protection Officer, The Consortium Academy Trust, c/o Cottingham High School, Harland Way, Cottingham, East Riding of Yorkshire, England, HU16 5PX.

## 9. Cookies - Consortium Academy Trust Website ([www.consortiumtrust.co.uk](http://www.consortiumtrust.co.uk))

9.1 The Consortium Academy Trust Website ("the Trust Website") uses "cookies" for our legitimate interests in ensuring that you receive the best possible visitor experience. Cookies are small files which are sent by a web server to an individual's computer which are then stored on that computer's hard drive. A cookie contains text, and is like an identification card which can only be translated by the server it originated from.

9.2 Cookies cannot tell us information such as your email address, which we can only collect where you tell us, for example if you complete any of our information capture forms.

9.3 The Trust Website uses the following cookies for the following purposes:

Cookie Name and Provider	Purpose	More Information
cookiesAllowed (Allow Cookies - provided by	This cookie is used to determine whether the user allows cookies or not	This cookie is necessary for the Trust Website to function and cannot be switched off in our systems. It is usually only

Cookie Name and Provider	Purpose	More Information
e4education)		<p>set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.</p> <p>You can set your browser to block or alert you about this cookie, but some parts of the Trust Website will not then work. This cookie does not store any personally identifiable information.</p>
.NID (Google Maps - provided by google.com)	<p>Most Google users will have a preferences cookie called 'NID' in their browsers. A browser sends this cookie with requests to Google's sites. The NID cookie contains a unique ID Google uses to remember your preferences and other information.</p>	<p>This cookie allows us to count visits and traffic sources so we can measure and improve the performance of the Trust Website. It helps us to know which pages are the most and least popular and see how visitors move around the Trust Website. All information this cookie collects is aggregated and therefore anonymous. If you do not allow this cookie we will not know when you have visited the Trust Website, and will not be able to monitor its performance.</p>
<b>Google Analytics</b> _utma _utmb _utmc _utmz	<p>Used to track your movement around the website, we use this information to see what information is popular and then tweak the website to ensure people access the most relevant information easily.</p> <p>This is a 3rd party cookie set by them and is governed by their privacy policy, which can be found at <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a></p>	
<b>YouTube</b>	<p>This may be set if we have embedded a YouTube video on a page. This is a 3rd</p>	

<b>Cookie Name and Provider</b>	<b>Purpose</b>	<b>More Information</b>
	party cookie set by them and is governed by their privacy policy, which can be found at <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>	
<b>Vimeo</b>	This may be set if we have embedded a Vimeo video on a page. This is a 3rd party cookie set by them and is governed by their privacy policy, which can be found at <a href="https://vimeo.com/cookie_policy">https://vimeo.com/cookie_policy</a>	
<b>Twitter</b>	Only set if any official twitter widgets are included in the site. This is a 3rd party cookie set by them and is governed by their privacy policy, which can be found at <a href="https://twitter.com/privacy">https://twitter.com/privacy</a>	

- 9.4 Most internet browsers allow you to prevent cookies being stored on your computer. Alternatively you may be able to configure your browser to accept all cookies or to notify you when a cookie is offered by our server. You may also be able to delete all cookies currently stored on your web browser.
- 9.5 As mentioned in section 9.3 above, some parts of the Trust Website require cookies to be enabled in order to function correctly. Therefore unless you change your browser settings you will automatically accept cookies from the Trust Website.
- 9.6 For further information about cookies and how they are used, please visit [www.aboutcookies.org](http://www.aboutcookies.org).