



## Privacy Notice

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## PRIVACY NOTICE

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### 1. Privacy Notice for Parents

#### 1 INTRODUCTION

1.1 We are committed to protecting and respecting your and your child's privacy. Sophia Technologies is an online education and private tuition provider, which includes Sophia High School.

In this privacy notice, references to "we", "us", "our", or "Sophia" is a reference to Sophia Technologies Ltd and the school which your child is attending, may be attending or has attended.

1.2 This privacy notice sets out the basis on which any personal data we collect from you or your child, or that you provide to us, is handled by us. We also have a privacy policy for our pupils, this is available on our website.

1.3 Please read the following carefully to understand our views and practices regarding your and your child's personal data and how we will treat it.

1.4 For the purposes of the General Data Protection Regulation 2016/679 ("GDPR"), we are the data controller and our Head Office is at 31 Draycott Avenue, London, SW3 3BS. Our ICO registration number is A8689834

1.5 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 school;

2.1.3 corresponding with us by phone, e-mail or post; and

2.1.4 sending information directly to us, for example when paying our fees, giving us information about your child's health, completing school admission forms, signing our parent contract or providing information as requested by us and/or which is necessary from time to time.

2.2 The information you give us may include the following information about you and / or your child:

2.2.1 full name;

2.2.2 date of birth and year group;

2.2.3 contact details (including home address, e-mail address, and mobile, home and/or work phone number);

2.2.4 parent login information (i.e. username and password) for the website;

2.2.5 financial and credit card information;

2.2.6 photograph;

2.2.7 passport details, nationality and other information relating to immigration status;

2.2.8 education and health records (including special education needs, medical or physical conditions and/or accidents);

2.2.9 previous educational records and achievements;

2.2.10 (where appropriate) family circumstances (including your relation to the child and your marital status); and

2.2.11 race, religion and ethnicity.

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 have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies 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, your child's previous or new school(s), local authorities, education authorities, business partners, payment and delivery services, debt collectors, lawyers and credit reference agencies) and may receive information about you from them.

2.6 We may also use live lesson recordings to ensure the Safeguarding of all our students. 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 [David.McCarthy@sophia.app](mailto:David.McCarthy@sophia.app) or in writing to Sophia Technologies Ltd, 31 Draycott Avenue, London SW3 3BS.

### **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:

- 5.1.1 to deliver educational services to your child;
- 5.1.2 to protect the welfare of your child, 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;
- 5.1.3 to store this information on the school's chosen management information system;
- 5.1.4 to use your child's photograph as part of a manual ID system on the school management information system;
- 5.1.5 to manage any queries or disputes you or your child may have with us or that we have with you or your child;
- 5.1.6 to enforce our terms of use with you or any other contract we may have with you (including the parent contract);
- 5.1.7 where your child is attending one of our schools, to provide you with information about other similar services we offer as part of the education and overall development of your child at the school;
- 5.1.8 once your child has left the school, to keep you up to date with key school news and upcoming events; and
- 5.1.9 to send out surveys to you by email as part of our Voice of the Parent campaign which is our school improvement tool.

5.2 In order to pursue the legitimate interests referred to in paragraphs 5.1.1 and 5.1.3, our schools also rely on software applications and other technology to process personal data about you and your children. These include the school's management information system, virtual learning environments (including the setting of tasks and homework), revision tools, parents evening booking systems, text

and email messaging communications, assessments of pupils' progress, our Stripe billing system. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your and your child's personal data is kept secure. For further information on the kind of technology we use, please contact our Data Protection Officer or Data Protection Co-ordinator (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. For example, we will provide education services to your child and will use personal data where necessary to deliver these services. We will also use your personal information to invoice you for our services pursuant to the contract between you and us. We will also require a certain amount of personal information about you and your child at the pre-contract enquiry and application stage.

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

5.4.1 keep an admissions and attendance register;

5.4.2 keep pupil files (including, where relevant, special education needs and child protection files);

5.4.3 keep a record of behaviour sanctions; and

5.4.4 provide an annual written report on pupil progress and attainment.

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 or Data Protection Co-ordinator (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 to allow you and your child to participate in interactive features of our service, for example virtual learning environments, when you choose to do so; and

5.6.5 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 court

order relating to you which impacts on our use of your and your child's information to protect the welfare of the child.

5.8 Also, social services or health practitioners may provide us with information (particularly sensitive personal data) about your child which may need to be added to the school's child protection or special educational needs file. This kind of processing of sensitive personal data may be necessary (a) for the purposes of carrying out our obligations in the field of social security or social protection law, (b) for medical diagnosis or provision of health care and/or (c) to protect the vital interests of your child or another person taking into account the mental and physical capacity of your child.

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

5.10 In order to pursue one of the legitimate interests set out above, we may share your and your child's personal information with:

5.10.1 Sophia Technologies Head Office

5.10.2 A member of the Sophia 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;

5.10.3 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 your child;

5.10.4 where your child is not British, we may have to provide information about you or your child to UK Visas and Immigration;

5.10.5 business partners, professional advisors, debt collector, suppliers and sub-contractors for the performance of any contract we enter into with them or you;

5.10.6 credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

5.11 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 or apply our terms of use the terms of the parents' contract (between us and you) and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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

5.12 We will not market services to you (other than in accordance with paragraph 5.1.8 or 5.1.9 above) without your consent and you have the right to ask us not to use your contact details for marketing.

5.13 We will also seek your permission if we decide to post any photographs of your child on any of our marketing materials (including our prospectus, advertisements or website).

5.14 You or your child do not have to give us details about your child's race, religion or ethnicity if you do not want to. If you do provide us with this information, we only use these details to assist us with the day-to-day running of the school (for example, if your child's religion means that he or she has

particular dietary requirements then we will of course be much better informed if we have this information to cater to your child's requirements) and for equal opportunities monitoring purposes.

Where you have given consent to the above, you can withdraw this consent at any time by contacting the Data Protection Coordinator (see paragraph 4).

## 6 TRANSMISSION OF PERSONAL INFORMATION OUTSIDE THE EEA

6.1 The data that we process about you and your child 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 and your child's 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 adequate.

## 7 YOUR RIGHTS

7.1 Under the GDPR, you and your child have the following rights:

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

7.1.2 The **right to erasure.** You have the right to request that we delete your and your child's 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. We encourage you to contact the school's Data Protection Co-ordinator and request our standard SAR form for you to complete in order to help us process your request.

***Subject access requests and other rights of individuals.***

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

***Children and subject access requests***

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent. Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

***Responding to subject access requests***

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary
- We will not disclose information if it:
  - Might cause serious harm to the physical or mental health of the pupil or another individual
  - Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests



- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child
- If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.
- A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.
- When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

## **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 As a general rule, we keep your child's education records until they reach 25 years of age at which point we destroy the file. This is regardless of whether their file has been transferred to another school, in the event that your child transfers schools.

8.3 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 or Data Protection Co-ordinator (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 appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

## 2. Sophia High School Privacy Notice for Students

### INTRODUCTION

Your school is part of Sophia. Sophia is responsible for how your school looks after your personal information. When we say “we” in this notice, this means your school and Sophia. We are required by law to look after the information we hold about you; this notice tells you how we do this.

Personal information is any information which is about you, from which you can be identified.

Please make sure you read this privacy notice carefully. This notice is a short form version of the full notice we have provided to your parents. If you would like more information, please speak to your teacher, you can also look at the privacy notice for your parents. This is available on our website.

### WHAT PERSONAL INFORMATION MIGHT THE SCHOOL HOLD ABOUT YOU?

- Your full name, date of birth, grade and photograph;
- Your home address, home telephone number and mobile number;
- Your school email address and personal email address;
- Your academic records and test results;
- Your medical records (including special education needs and/or accidents); and
- Your race, religion or ethnicity.

### INFORMATION WE RECEIVE FROM, AND SHARE WITH, OTHER PEOPLE OR COMPANIES

We will share your information with your parents. If you are not British, we may have to provide information about you to UK Visas and Immigration.

We may work with other institutions such as your previous or new school, school nurses or doctors, local authorities, social services, police (where there are concerns with your safety), education authorities, SEN co-ordinators, the school’s business partners and professional advisors. We might receive or share information about you from them or give information to them. We will only do so as set out in this notice. We may also use live recordings from your teaching sessions to ensure the safeguarding of all participants.

### CONTACT US IF YOU HAVE FURTHER QUESTIONS

If you have any questions about this notice then please speak to your teacher. We have a Data Protection Co-ordinator, Alberto Iglesias, [alberto.iglesias@sophia.app](mailto:alberto.iglesias@sophia.app) who can explain in more detail how your information is looked after.

Our Data Protection Officer has overall responsibility for your information:  
[David.McCarthy@sophia.app](mailto:David.McCarthy@sophia.app)

## HOW THE SCHOOL USES YOUR INFORMATION

We will use the information you and your parents give us as is necessary to provide you with the information and services that your parents request from us (to look after you, teach you and to deal with any queries they may have). We are also required by law to take a register, keep a personal file about you, keep a record of your behaviour and provide a written report on your progress.

We also use your information to promote the objects and interest of our schools, ensuring the most efficient management of the school and ensuring that the school's legal obligations are adhered to; and use your photograph as part of a manual ID system. These are known as "**legitimate interests**".

**Help from third parties.** We rely on software applications and other technology provided by other people to handle your information. These include virtual learning environments (including the setting of tasks and homework), revision tools, parents evening booking systems, text and email messaging communications, assessments of your progress and co-ordination of school trips. The companies we use to deliver these applications are carefully chosen by us to ensure that your information is kept secure.

## SENSITIVE PERSONAL DATA

When we hold details about your health and wellbeing, this information is called "sensitive personal data" which means we treat this information even more carefully. We will need to hold sensitive personal data about you (a) for carrying out our obligations in the field of social security or social protection law, (b) for identifying medical problems or provision of health care or (c) to protect your vital interests. To achieve this, we may also use software applications and other technology.

## WHERE WE NEED YOUR CONSENT

We will seek your or your parent's permission if we decide to post any photographs of you on any of our marketing materials (including our prospectus or website); you may withdraw your permission should you wish.

You do not have to give us details about your race, religion or ethnicity if you do not want to. If you do, we will use this to help run the school (e.g. if your religion means that you have certain dietary requirements) and to monitor equal opportunities. You can ask us to delete this information at any time.

## TRANSFER OF PERSONAL INFORMATION OUTSIDE THE COUNTRY

Sometimes your information will need to be transferred to, and stored outside the UK. We try to limit this, but it may be necessary where, e.g. one of our suppliers stores your information outside Europe. We take all steps reasonably and legally necessary to ensure that your information is safe.

## YOUR RIGHTS

- **Right to request access** to your personal information (a “subject access request” or “SAR”).
- **Right to request correction** of the personal information that we hold about you.
- **Right to request deletion** of your personal information.
- **Right to object** to processing of your personal information.
- **Right to request the restriction of processing** of your personal information.
- **Right to request the transfer** of your personal information to another organisation (e.g. another school).
- **Right to complain to the Information Commissioners Office** about what we are doing with your information: <https://ico.org.uk/concerns/>.

## HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will not keep any personal information about you for any longer than is necessary. Generally, we keep your pupil record file until you are 25 (even if you have changed school) after which it is destroyed. We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information, please speak to your teacher.

## CHANGES TO THIS PRIVACY NOTICE

We may change this notice, we will let you know if we do. The date of updates is registered on the cover page of this notice.

## Online Learning Supplementary Privacy Notice for Parents and Students

### 1 INTRODUCTION

1.1 We are continuously committed to protecting and respecting the privacy of our parents and pupils and our staff. Sophia High is an online education provider providing remote education for students via our Digital Learning Platform (“DLP”) in partnership with Google for Education Workspace.

1.2 Please read this supplementary privacy notice in conjunction with the Parent Privacy Notice, This supplementary notice and the School’s Photo and Video Media Consent Form, (together with the Existing Notices) sets out the basis on which any personal data we collect from parents and pupils is handled by us when taking part in our DLP.

### 2 USES MADE OF THE INFORMATION

2.1 To ensure that educational content is presented in the most effective manner, and our pupils’ online experience is as appropriate as possible, delivery of educational services via our DLP will involve the processing of personal data, including in the following contexts:

2.1.1 pupils participating in live, online, face-to-face interactive lessons and tutorials with other pupils and teachers;

2.1.2 pupils participating in live video calls and tutorials with other pupils and teachers;

2.1.3 online chat services;

2.1.4 one-on-one sessions between teachers and pupils in specific cases for example for SEN, or for private tuition;

2.1.5 pupil to pupil interaction;

2.1.6 peer review: teachers reviewing other teachers’ lessons for quality assurance;

2.1.7 recordings of the remote classes being made by the School and stored on the DLP/Google Platform (“Recordings”);

2.1.8 recording being shared between Sophia High School, Sophia Technologies and any of our accreditation advisory teams including the UK DfE, Ofsted and Council of International Schools for evaluation purposes.

### 3 BASIS OF PROCESSING

3.1 The School’s processing of personal data via the DLP is necessary for its legitimate interests, which in this context includes the following purposes:

3.1.1 to deliver educational services to our pupils and to monitor pupils' progress and educational needs;

3.1.2 to promote and fulfil the objects and interests of the School and ensure its efficient management and administration; and

3.1.3 to safeguard our children's welfare and provide appropriate pastoral care whilst they are taking part in the DLP.

3.2 Some of this activity undertaken via the DLP the School will need to carry out in order to fulfil its legal rights, duties or obligation – including those under a contract with its staff, or parents of pupils.

#### **4 THIRD-PARTY SOFTWARE PLATFORMS**

4.1 We use third party software platforms including, but not limited to, Google Workspace, Google Classroom, 3PLearning, LanguageNut, OxfordOwl, EngageVR, to facilitate our DLP; please also read the privacy notices, and applicable terms and conditions, provided by any such third parties. The third party notices will set out the data collection, use, and retention for the service they are providing. This notice only sets out how the School uses personal data for its DLP.

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

5.1 The Recordings shall be retained by the School for so long as the DLP is maintained by the School and thereafter in accordance with the School's Retention Policy.

#### **6 QUESTIONS**

6.1 If you have any questions about this supplementary privacy notice, please contact the School's DPC.

#### **7 CHANGES TO THIS POLICY**

7.1 The School reserves the right to update this supplementary notice at any time. You will be notified of any material change.

### 3. Sophia High School Cookie Policy

#### 1 WHAT IS A COOKIE?

1.1 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive. To find out more about cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org).

#### 2 ABOUT OUR USE OF COOKIES

2.1 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 allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

2.2 When you visit our website, we may automatically collect the following information:

2.2.1 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

2.2.2 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.

#### 3 COOKIES WE USE AND WHY

3.1 **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website or make use of e-billing services.

3.2 **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

3.3 **Google Advertising cookies.** [Google Analytics' Display Advertiser features](#) are enabled for the Google Analytics property this website is tagged with. This means that Google Analytics will drop additional cookies on your browser and collect data using [Google's advertising cookies](#) and identifiers, in addition to data collected through a standard Google Analytics implementation. For more information about Google's Advertising Cookies and how you can control advertising cookies visit [Google Advertising Privacy FAQ](#) and [Google's advertising cookies](#).

3.4 **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.

**3.5 Marketing cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising around the web more relevant to you. We may also share this information with third parties for this purpose.

3.6 You can find more information about the individual cookies we use and the purposes for which we use them in the table enclosed.

## **4 WE HAVE NO CONTROL OVER THIRD PARTY COOKIES**

4.1 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

4.2 Our website may also 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 have their own cookie notices and privacy notices and that we do not accept any responsibility or liability for these notices. Please check these notices before you submit any personal data to these websites.

## **5 HOW DO I CHANGE MY COOKIE SETTINGS?**

5.1 Generally, browsers allow some control of most cookies through the browser settings. To find information relating to the browser you are using, please visit the browser developer's website, below are links to some of the most common browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Apple Safari](#)

## **6 WHAT HAPPENS IF YOU BLOCK COOKIES?**

6.1 You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our site and your user experience may be seriously downgraded whilst browsing the site.

## **7 EXPIRY OF COOKIES**

7.1 When we send a cookie, we instruct your browser to keep that cookie for a certain period of time, for example, we may instruct your browser to keep the cookie for the period you are on the website;



this is known as a “session cookie”. You can override the cookie expiration periods set by us, or any other website, by changing your cookie settings. If you do not change your settings, then, all cookies set by us will expire after 6 months. Default expiration settings will vary for third-party cookies; you can find out more about these by following the links in section 3.5.

## **8 CONTACT US**

8.1 If you have any questions regarding this Cookie Notice please contact our Data Protection Coordinator, Alberto Iglesias via email at: [albero.iglesias@sophia.app](mailto:albero.iglesias@sophia.app)

## Appendix 1: Personal data breach procedure

This procedure is based on guidance on personal data breaches produced by the ICO.

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the DPO
- The DPO will investigate the report, and determine whether a breach has occurred. To decide, the DPO will consider whether personal data has been accidentally or unlawfully:
  - Lost
  - Stolen
  - Destroyed
  - Altered
  - Disclosed or made available where it should not have been
  - Made available to unauthorised people
  - The DPO will alert the CEO and the Executive Director
  - The DPO will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary. (Actions relevant to specific data types are set out at the end of this procedure)
- The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The DPO will work out whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the DPO will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
  - Loss of control over their data
  - Discrimination
  - Identify theft or fraud
  - Financial loss
  - Unauthorised reversal of pseudonymisation (for example, key-coding)
  - Damage to reputation
  - Loss of confidentiality
  - Any other significant economic or social disadvantage to the individual(s) concerned
- If it's likely that there will be a risk to people's rights and freedoms, the DPO must notify the ICO.
- The DPO will document the decision (either way), in case it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored on the school's admin server.
- Where the ICO must be notified, the DPO will do this via the 'report a breach' page of the ICO website within 72 hours. As required, the DPO will set out:
  - A description of the nature of the personal data breach including, where possible:
    - The categories and approximate number of individuals concerned
    - The categories and approximate number of personal data records concerned
  - The name and contact details of the DPO
  - A description of the likely consequences of the personal data breach

- A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours. The report will explain that there is a delay, the reasons why, and when the DPO expects to have further information. The DPO will submit the remaining information as soon as possible
- The DPO will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact. If the risk is high, the DPO will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out:
  - The name and contact details of the DPO
  - A description of the likely consequences of the personal data breach
  - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
  - The DPO will notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
  - The DPO will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
    - Facts and cause
    - Effects
    - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored on the school's admin server.

- The DPO and headteacher will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible

### **Actions to minimise the impact of data breaches**

We will take the actions set out below to mitigate the impact of different types of data breach, focusing especially on breaches involving particularly risky or sensitive information. We will review the effectiveness of these actions and amend them as necessary after any data breach.

#### ***Sensitive information being disclosed via email (including safeguarding records)***

- If special category data (sensitive information) is accidentally made available via email to unauthorised individuals, the sender must attempt to recall the email as soon as they become aware of the error
- Members of staff who receive personal data sent in error must alert the sender and the DPO as soon as they become aware of the error
- If the sender is unavailable or cannot recall the email for any reason, the DPO will ask the ICT department to recall it
- In any cases where the recall is unsuccessful, the DPO will contact the relevant unauthorised individuals who received the email, explain that the information was sent in error, and request that those individuals delete the information and do not share, publish, save or replicate it in any way

- The DPO will ensure we receive a written response from all the individuals who received the data, confirming that they have complied with this request
- The DPO will carry out an internet search to check that the information has not been made public; if it has, we will contact the publisher/website owner or administrator to request that the information is removed from their website and deleted

***Sensitive information being disclosed via school website***

- Member of staff who discovers the sensitive information to inform the DPO as soon as possible.
- DPO to arrange for information to be removed from the school website immediately.
- Parents to be informed that sensitive information was available on the website and that action has been taken to remove it.
- DPO to follow data breach protocols.

<b>Document authors (name &amp; role)</b>	David McCarthy – Director of Education Vanessa Temple - Director of Education Melissa McBride – Chair of the Board
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