PRIVACY NOTICE – Members of the public who use our Sports Centre or the Perse Academy of Performing Arts

WHAT THIS NOTICE IS FOR

This privacy notice is intended to provide information about how The Perse School and its subsidiary, The Perse School Cambridge International LTD (the "School"), will use (or "process") Personal Data about individuals who book and use the Sports Centre facilities.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

This **Privacy Notice** applies alongside any other information The Perse School and its subsidiary, The Perse School Cambridge International LTD, may provide about a particular use of Personal Data, for example, when collecting data via an online or paper form.

This **Privacy Notice also** applies in addition to the School's other relevant terms and conditions and policies, including:

- the School's CCTV policy;
- the School's Records Management Policy and Records Retention Schedule;
- the School's Data Protection policy;
- the School's safeguarding, or health and safety policies, including as to how concerns or incidents are recorded; and

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Director of ICT as the Data Processing Manager who will deal with all day-to-day requests and enquiries concerning the School's use of Personal Data (see section on Your Rights below). The Bursar has ultimate responsibility for all Data Protection.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to visitors who book and the Sports Centre, the School may process a wide range of Personal Data about you as part of its daily operation.

Some of these activities the School will need to carry out in order to fulfil its legal rights, duties or obligations.

The table below contain a general description of the different legal bases for processing Personal data.

Legitimate interests

This means that the School is using your Personal Data when this is necessary for the School's (or sometimes a third party's) legitimate interests except when your interests and fundamental rights override our legitimate interests. Our "legitimate interests" include our interests in running the school in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law).

Specifically, the School has a legitimate interest in:

- keeping the school buildings safe;
- using your Personal Data in connection with legal disputes. For example, a claim is brought against the School regarding education, care or welfare;
- protecting the School's reputation;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections);

Necessary for contract

We will need to use your Personal Data in order to perform our obligations under our contract with you and for you to perform your obligations as well.

Legal obligation

Where the School needs to use your Personal Data in order to comply with a legal obligation. We may also have to disclose your Personal Data to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

In limited circumstances we may use your Personal Data to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks)

The following are examples of when we use your Personal Data to perform tasks in the public interest:

- safeguarding & promoting your welfare, your child's welfare & the welfare of other children;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

CONSENT

Where the School is relying on consent as a means to process Personal Data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the School may have another lawful reason to process the Personal Data in question even without your consent.

MORE THAN ONE BASIS

In some cases, we rely on more than one basis for a particular use of Personal Data. The basis that we will rely on for a particular purpose may vary depending on the circumstances.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information
- where appropriate, information about individuals' health, and contact details for their next of kin;

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives Personal Data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email).

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Occasionally, the School will need to share Personal Data relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police, health services or the local authority).

For the most part, Personal Data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Where third parties are engaged, they will be required to confirm their compliance with Data Protection Law.

Finally, in accordance with data protection laws, some of the school's processing activities are carried out on their behalf by third parties, such as IT systems, web developers, or cloud storage providers. This is always subject to contractual obligations that Personal Data will be kept securely and only in accordance with the School's specific directions.

HOW LONG WE KEEP PERSONAL DATA

The School will retain Personal Data securely and only in line with how long it is necessary to keep it for a legitimate and lawful reason. The retention of data is outlined in the Records Retention Schedule. If you have any specific queries about how this schedule is applied or wish to request that Personal Data that you no longer believe to be relevant be considered for erasure, please contact the Data Processing Manager. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand Personal Data about them held by the School, and in some cases ask for it to be erased or amended or for the School to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access, erase, restrict processing, obtain, object or amend their Personal Data, should put their request in writing to the Data Processing Manager.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to Personal Data. The School will be better able to respond quickly to smaller, targeted requests for Personal Data. If the request is manifestly excessive or similar to previous requests, the School may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain types of data are exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

SENDING PERSONAL DATA TO OTHER COUNTRIES

When the School sends Personal Data outside of the UK, we have to consider if the other country has the same level of protection for Personal Data as there is in the UK. Some countries are considered by the UK Government to have adequate rules, and this includes all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Japan.

In certain circumstances, we may send your information to countries which do not have the same level of protection for Personal Data as there is in the UK. For example, we may store your information on cloud computer storage based in the USA.

We will provide you with details about where we are sending your Personal Data, whether the country has an adequacy decision and if not the safeguards which we have in place outside of this Privacy Notice.

If you have any questions about the safeguards that are in place, please contact the Data Processing Manager.

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

Data protection legislation gives you a number of rights regarding your Personal Data. Your rights are as follows:

- **Rectification**: if information is incorrect, you can ask us to correct it.
- **Access**: you can also ask what Personal Data we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this data about you, where it came from and what types of people we have sent it to.
- **Deletion**: you can ask us to delete the Personal Data that we hold about you in certain circumstances. For example, where we no longer need the data.
- **Portability**: you can request the transfer of your Personal Data to you or to a third party in a format that can be read by computer. This applies where (a) the data has been provided by you; (b) the basis that we are relying on to process your data is consent or contract (please see "Our legal bases for using your data below"); and (c) the data is being processed by us on computer.

- **Restriction**: our use of Personal Data about you may be restricted in some cases. For example, if you tell us that the data is inaccurate, we can only use it for limited purposes while we check its accuracy.
- **Object**: you may object to us using your Personal Data where:
    - we are using it for direct marketing purposes
    - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all Personal Data held in relation to an individual is as up to date and accurate as possible. Individuals should notify the School Office any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or Personal Data about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of Personal Data about individuals, including policies concerning the use of technology and devices, and access to school systems. All staff and governors will be made aware of this Privacy Notice and their duties under Data Protection Law and receive relevant training.

THIS PRIVACY NOTICE

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this Privacy Notice should be directed to the Data Processing Manger using the following contact details The Data Processing Manager, The Perse School, Hills Road, Cambridge, CB2 8QF.

If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School's Complaints Procedure and should also notify the Data Processing Manager. The individual can also lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the Regulator.

January 2026