



Privacy Notice

GDPR

Last Updated 16th April 2018

Data protection and protection of personal data is a top priority for SchoolBooking. This notice outlines the steps put in place by us to ensure that your personal data and personal sensitive data is kept as secure as possible whilst being processed by SchoolBooking or its associated processors.

The processing of personal data (as defined by the ICO) of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the ICO's legislation. SchoolBooking has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed across all operations and will continue to be proactive in this area.

By means of this Privacy Notice, SchoolBooking informs users and third parties the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

1. Definitions

The data protection declaration of SchoolBooking is based on the terms used in the General Data Protection Regulation (GDPR). Because statements on pledges on personal data security should be legible and understandable for the anticipated user, there follows an explanation the terminology used.

In this notice the following terms are used:

a. **Personal data**

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an ID number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, political, cultural or social identity of that natural person.

b. **Data subject**

The data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c. **Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.

d. Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e. Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f. Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g. Controller

The data controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

h. Processor

The data processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i. Recipient

A recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with UK law shall not be regarded as recipients; the processing of those data by those public authorities shall follow the applicable data protection rules according to the purposes of the processing.

j. Third party

A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, is authorised to process personal data.

k. Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

School Booking Ltd

The Creative Media Centre

45 Robertson Street

Hastings

TN34 1HL

United Kingdom

Email: customer.services@schoolbooking.com / privacy@schoolbooking.com

Website: <https://www.schoolbooking.com>

3. Processing of personal data

SchoolBooking processes personal data across all its sites for a wide variety of reasons. Personal data and personal sensitive data may be processed as part of standard activities.

Our staff have all been trained in the principles of data protection as part of their roles at SchoolBooking. Every effort is made to ensure we only work with processors who adhere to the standards expected of and from SchoolBooking and due diligence is completed on new suppliers ahead of agreements.

Where at all possible, any technical solution that can help safeguard personal data in transit or at rest is implemented and staff constantly monitor developments that may help further these efforts. Data mapping is undertaken to ensure we are aware how and where data is processed internally and through processors, as per the expectation of GDPR.

Below is an outline of how SchoolBooking adheres to the rights of the data subject under GDPR, along with details on legal bases for processing, the retention pledge and other key information regarding your rights.

4. Rights of the data subject

a. Right of confirmation

Each data subject has the right to obtain from SchoolBooking as the controller the confirmation as to whether personal data concerning him or her is being processed. If a data subject wishes to exercise this right, they should contact privacy@schoolbooking.com in the first instance.

b. Right of access

Each data subject has the right to obtain from SchoolBooking as controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- The purposes of the processing;
- The categories of personal data concerned;
- The recipients or categories of recipients to whom the personal data have been or will be disclosed;
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- The existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;

- The existence of the right to lodge a complaint with a supervisory authority;
- Where the personal data are not collected from the data subject, any available information as to their source;
- The existence of automated decision-making, including profiling, referred to in [Article 22\(1\) and \(4\)](#) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

The data subject shall also have a right to obtain information as to whether personal data is transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to exercise this right, they should contact privacy@schoolbooking.com in the first instance.

c. **Right to rectification**

Each data subject has the right to request from SchoolBooking as the controller without undue delay the rectification of inaccurate personal data concerning themselves. The data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, they may, at any time, contact privacy@schoolbooking.com.

d. **Right to erasure (Right to be forgotten)**

Each data subject has the right to request from SchoolBooking as the controller the erasure of personal data concerning themselves without undue delay. SchoolBooking shall have the obligation to erase personal data without undue delay where one of the following grounds applies, if the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent and there is no other legal ground for the processing.
- The data subject objects to processing and there are no overriding legitimate grounds for continuing to process.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with legal obligation.
- The personal data have been collected in relation to the offer of information society services ([see to in Article 8\(1\)](#) of the GDPR).

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by us they may at any time contact privacy@schoolbooking.com.

Where SchoolBooking as controller has made personal data public and is obliged under Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. SchoolBooking staff will arrange and oversee the necessary measures in individual cases.

e. **Right of restriction of processing**

Each data subject has the right to obtain from SchoolBooking as controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

- The processing is unlawful, and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- SchoolBooking no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing under Article 21(1) of the GDPR, pending verification regarding whether the legitimate grounds of the controller override those of the data subject.

If one of these conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored, they may at any time contact privacy@schoolbooking.com.

f. **Right to data portability**

Each data subject has the right to obtain from SchoolBooking as controller their personal data, which was provided to a controller, in a structured, commonly used and machine-readable format. The data subject shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. Furthermore, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

To assert the right to data portability, the data subject may at any time contact privacy@schoolbooking.com regarding the request.

g. **Right to object**

Each data subject shall have the right to object, on grounds relating to their situation, at any time, to processing of personal data concerning them, including profiling, by SchoolBooking.

SchoolBooking shall no longer process the personal data in the event of the objection, unless they can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If SchoolBooking processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to processing for direct marketing purposes, SchoolBooking will no longer process the personal data for these purposes.

To exercise the right to object, the data subject may directly contact privacy@schoolbooking.com.

h. **Automated individual decision-making, including profiling**

Each data subject shall have the right not to be subject to a decision by SchoolBooking as controller based solely on automated processing, unless profiling occurs for a legal purpose that supersedes the rights of the data subject.

In the event of automated profiling, we shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests.

If the data subject wishes to exercise their rights concerning automated individual decision-making, they may at any time contact privacy@schoolbooking.com.

i. **Right to withdraw data protection consent**

Each data subject shall have the right to withdraw their consent to processing of his or her personal data from SchoolBooking at any time, provided it is not being processed for legal reasons.

If the data subject wishes to exercise the right to withdraw the consent, they may at any time contact privacy@schoolbooking.com.

5. Legal basis for the processing

All processing by SchoolBooking of data subjects' personal data shall occur under one or more of the six lawful reasons for processing as defined in the regulation, Article 6(1).

6. Period for which the personal data will be stored

The data retention period used by SchoolBooking is 120 days. This is due to our offer of a 90 day grace period on trial and paying accounts. After this data is kept for an 30 additional days in case of customer request. After expiration of that period, the corresponding data is routinely deleted, if it is no longer necessary for the fulfilment of a contract or legal reasons.

If a request is made for data to be deleted earlier than this, SchoolBooking can accommodate this, providing data is no longer necessary for the fulfilment of a contract or legal reasons. Please email privacy@schoolbooking.com.

7. Routine erasure and blocking of personal data

SchoolBooking shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the ICO or other legislators in laws or regulations to which SchoolBooking as controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed expires, the personal data are routinely blocked or erased in accordance with legal requirements.

8. Existence of automated decision-making processor

As a responsible organisation, SchoolBooking do not use automatic decision-making or profiling. We will not knowingly work with or endorse any organisation, company or third party who does partake in automatic profiling.

9. Website use

Use of the SchoolBooking website is possible without any indication of personal data; however, if a data subject wants to use certain services via the website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we will obtain consent from the data subject.

As data controller, SchoolBooking has implemented technical measures to ensure this website is secure with personal data. However, internet-based data transmissions may in principle have security gaps, so absolute protection cannot not be guaranteed.

9.1 Collection of general data and information

The SchoolBooking website collects a series of general data and information when a data subject or automated system calls it up. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet

9.2 Contact possibility via the website

The SchoolBooking website contains information that enables a quick electronic contact, as well as direct communication with us. If a data subject contacts the controller by email or via contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for processing or contacting the data subject. There is no transfer of this personal data to third parties.

Any privacy questions should be directed to our Privacy Team, via privacy@schoolbooking.com. We endeavour to answer queries as soon as is possible.