



Privacy Notice for Reed's School Enterprises

1. Introduction

1.1 Reed's School Enterprises (RSE) is a wholly owned subsidiary of Reed's School, providing sports facility hire, sports coaching, classes and camps, (including swimming, cricket, tennis and multisports), a swimming club, professional training courses and the Reed's school shop. Reed's School is a registered educational charity based in Cobham, charity number 312008. For the purposes of the Data Protection Law, and this privacy notice, Reed's School and its subsidiary are the data controller.

1.2 This Privacy Notice applies to personal data held and used ("processed") by RSE about its customers and where the participants are children, their parents, carers or guardians (referred to in this policy as "parents").

1.3 This document is intended to provide information about how RSE will use the personal data relating to individuals and is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

1.4 While pandemic conditions persist, RSE may need to collect, share and otherwise process personal data in accordance with Government guidance. This may be for reasons not specifically set out in this Privacy Notice but always for the purposes of protecting public and individual health by seeking to limit the spread of coronavirus (COVID-19).

1.5 This Privacy Notice applies alongside any other information RSE may provide about a particular use of personal data, for example when collecting data via an online or paper form.

2. Responsibility for Data Protection

2.1 RSE and Reed's School is committed to protecting and respecting your privacy. Reed's School has appointed a Privacy Officer who will deal with any requests and enquiries concerning how RSE processes your personal data.

They can be contacted via email at privacyofficer@reeds.surrey.sch.uk

3. What personal data we may collect from you

3.1 Personal data means any information about an individual from which that individual can be identified.

3.2 Generally, RSE receives personal data from individuals directly (including, in the case of children, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication.

3.3 We collect, use and store some personal data of our participants (and their parents), and other swimming club members or customers. The information we may collect includes by way of example:

- name, gender, date of birth;
- address, telephone numbers, e-mail addresses;
- contact details of a third party or parent in case of emergency;
- where appropriate, information about individuals' health;
- correspondence with you; and
- images of participants engaged in activities (where consent for this has been given), and images on our CCTV system.

4. Why we need and how we use your data

4.1 We will only use your personal data for the purpose which it has been specifically provided.

4.2 The main reason we need personal data for participants (and their parents), swimming club members or customers is to provide you with the service for which you are paying, and as such we have a contractual obligation to use your personal data in the following ways:

- processing membership or booking forms and payments;
- providing you with the service that you have registered for, including sharing relevant information with our coaches where necessary;
- providing you with information about the service that you have registered for;

4.3 Relevant health information is required to ensure we understand any possible health risks from the activity being undertaken and to enable us to take appropriate action in the event of an incident or accident.

4.4 We may also use your personal data for purposes that are in the legitimate interest of RSE, such as:

- for site security purposes, using CCTV in accordance with the school's CCTV policy;
- for the purposes of management planning and forecasting to enable us to run our business as effectively as possible,
- for the investigation of any accident or safeguarding incident or concern that occurs; and
- sending out marketing information such as newsletters and information about future courses, classes and other services. We will only email you marketing information about services similar to those which you have previously purchased or enquired about, unless you have given your consent to receive all RSE marketing information.

Customers can update their mailing preferences at anytime by notifying their contact at RSE, or by clicking "unsubscribe" on emails received via MailChimp.

5. Who we share your data with

5.1 In the usual course of our business we may share your personal data with certain third party organisations that we use to support the delivery of services. These will include third party coaches for some of our activities and large organisations who provide IT systems or mailing services such as MailChimp and Google Forms. This sharing of data is always limited and subject to contractual assurances that personal data will be kept securely and used only for specified purposes in accordance with our specific instructions. Where we are using large companies such as MailChimp, we review their privacy policies and practises to ensure they too are meeting the requirements of Data Protection Law.

5.2 Apart from the above, personal data provided to RSE will not be shared with any third parties or other parts of Reed's School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

6. Data Accuracy and Security

6.1 We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify your RSE contact of any significant changes to important information, such as contact details, held about you.

6.2 RSE and the School will take appropriate technical and organisational steps to protect the personal data of individuals, to prevent it being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

7. How long we keep your personal data

7.1 We will keep your personal data while you continue to be a participant, swimming club member or customer of RSE. We will delete this data in an appropriate manner after you have left or otherwise ended your membership or affiliation. We may need to retain some personal data longer for legal or regulatory purposes.

8. Your Rights

8.1 As a data subject, you have the right at any time to request access to, rectification or erasure of your personal data, to restrict or object to certain kinds of processing of your personal data, including direct marketing and to the portability of your personal data.

8.2 To exercise any of these rights, or for any complaints with respect to how we use your personal data, please contact the Privacy Officer at privacyofficer@reeds.surrey.sch.uk

9. This Policy

9.1 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. Minor changes will be made as needed, with the latest version always being available on the RSE section of the School's website.

10. Contact

10.1 Any comments or queries on this policy should be directed to the Privacy Officer, at privacyofficer@reeds.surrey.sch.uk

10.2 In addition to contacting the Privacy Officer, if you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you can also lodge a complaint with the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>

Compiled by: Privacy Officer	Revision Number: 4 (Summer Term 2022)
	Next Revision date: Summer Term 2023