

ISCA Limited

Privacy Policy

Welcome to ISCA Limited's privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy explains how we look after your and your child's personal data when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you and your child.

In brief:

- We need to process your and your child's personal data to provide the services and for no other reason.
- Children need particular protection when their personal data is being collected and processed because they may be less aware of the risks involved.
- Our systems and processes are designed to ensure protection of all personal data processed by us.
- We make sure that our data processing is fair, complies with the data protection principles and is only ever done for the purposes of providing the services to you and your child.
- We do not use any personal data which we collect for marketing purposes other than photographs as explained in clause 7 of our [Terms and Conditions](#).

1. Important information and who we are

Purpose of this privacy policy. This privacy policy aims to give you information on how we collect and process your and your child's personal data through your use of this website, including any data you may provide through this website when you purchase a service.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data so that you are fully aware of how and why we are using such personal data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Contact details. If you have any questions about this privacy policy or our privacy practices, please contact us via your child's school.

You and your child both have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes. We keep our privacy policy under regular review.

It is important that the personal data we hold about you and your child is accurate and current and please therefore keep us informed of any changes.

Third-party links. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you and your child

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you and your child which we have grouped together as follows:

- **Identity Data** includes first, middle and last names, title, date of birth and passport details.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website].

If you fail to provide personal data. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

You will give us your and your child's personal data by filling in forms via our website. Doing so will enable us to provide the services.

4. How we use your and your child's personal data

We will only use your and your child's personal data when the law allows us to, and in particular to perform the contract we are about to enter into or have entered into with you.

Marketing. We do not use personal data for marketing purposes other than photographs as explained in clause 7 of our [Terms and Conditions](#).

Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please [click here](#).

Change of purpose. We will only use your and your child's personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your or your child's personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your or your child's personal data without your or your child's knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. International transfers

We do not transfer your personal data outside the European Economic Area.

6. Data security

We have put in place appropriate security measures to prevent your or your child's personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you, and your child if relevant, and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use personal data for? We will only retain your or your child's personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our contract with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your or your child's personal data, the purposes for which we process your or your child's personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see point 8 Your legal rights below for further information.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. In relation to personal data which we hold about you and your child, you and your child have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of such personal data and to check that we are lawfully processing it.

Request correction of the personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you

withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact your child's school.

No fee usually required. You will not have to pay a fee to access your or your child's personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you. We may need to request specific information from you or your child to help us confirm your identities and ensure your rights to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

ISCA Limited 08/10/2018