

PRIVACY NOTICE

Applicable to:	RGS Guildford RGS Prep, including EYFS
Author(s):	Director of IT
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1. WHO WE ARE

We are The Royal Grammar School Guildford, a company registered in England and Wales (the "School"). Our company registration number is 10874615, our charity registration number is 1177353 and our registered office is at The Royal Grammar School, High Street, Guildford, GU1 3BB. This Privacy Notice is intended to cover both the Senior and Prep School.

2. WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice explains how the School collects, uses, stores and otherwise processes personal data relating to current, former and prospective pupils, and their parents, carers or guardians (referred to in this Notice as "parents"). As a data controller, the School is required by data protection law to provide individuals with information about how their personal data is processed and about their rights in relation to that data.

This Privacy Notice is the School's primary privacy notice and explains how the School processes personal data in relation to its educational, pastoral, safeguarding, operational and charitable

activities. The School also publishes supplementary privacy notices for specific groups, including staff, parents and students aged 13 and over. These supplementary notices provide additional information relevant to those individuals and should be read alongside this Privacy Notice where applicable.

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

- any contract between the School and the parents of pupils;
- the School's policy on taking, storing and using images of children;
- the School's CCTV Policy;
- the School's Information and Records Retention Policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use Policy, Online Safety Policy and Social Media Policy.

3. RESPONSIBILITY FOR DATA PROTECTION

The School has appointed Mr Karl Rivers, Director of IT as Data Protection Officer ("DPO") who will deal with your requests and enquiries concerning the School's processing of your personal data (see section on "Your Rights" below) and endeavour to ensure that all personal data is processed in compliance with this Notice and data protection law. You can contact the School's DPO by email at dpo@rgsg.co.uk or by calling the School's Front Office on 01483 880600.

4. WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out our ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about our community as part of our daily operations. Some of this activity the School will need to carry out in order to fulfil our legal rights, duties or obligations – including those under a contract with our staff, or parents of our pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that category of our (or our community's) "legitimate interests":

- For the purposes of pupil selection, to confirm the identity of prospective pupils and their parents, and retain a record (if appropriate) for the purposes of future applications or openings;
- To carry out credit, identity and source of funds checks, whether with previous schools and/or third party sources or service providers, including for the purposes of verifying that parents are not subject to (or within the purview of) sanctions;
- To provide education services (including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils), and monitoring pupils' progress and educational needs, including where such services are provided remotely (either temporarily or permanently);

- To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings;
- To organise and manage meetings, events and social engagements for pupils and parents;
- To maintain relationships with alumni and the School community, including by direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past and current pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School;
- To safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on Keeping Children Safe in Education (or "KCSIE"));
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use Policy, including through the Lightspeed safeguarding monitoring tool which scans school devices and the School network for harm signals during school hours;
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children;
- For security purposes, including biometrics and CCTV in accordance with the School's CCTV Policy and other related policies;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- For regulatory record keeping / compliance purposes in respect of immigration requirements, as an employer and/or visa sponsor;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of a pupil's or an individual's health / medical condition or other relevant information where it is in the pupil's or an individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a pupil's health and medical conditions and special educational needs, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To comply with public health requirements;
- To provide educational services in the context of making reasonable adjustments for a pupil's disability and/or any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- To run any of our systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc.);
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring, health and safety and immigration / visa sponsorship compliance) and to comply with its legal obligations and duties of care.

5. 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;
- car details (about those who use our car parking facilities);
- biometric information, which will be collected and used by the School in accordance with the School's biometrics document;
- bank details and other financial information, e.g. about parents (or others) who pay fees to the School, and any source of funds and/or anti-money laundering information we are required to collect by law;
- past, present and prospective pupils' academic, disciplinary, admissions, safeguarding and attendance records, and examination scripts and marks;
- nationality and other immigration status information (e.g. right to enter, live and work or study in the United Kingdom), including copies of passport information;
- information about pupils' health and medical conditions, special educational needs and family circumstances / living arrangements;
- contact details for next of kin;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents (past and present); and
- images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images of children).

6. WEBSITE VISITORS, COOKIES AND ONLINE SERVICES

When individuals visit the School's website, the School may collect certain information automatically, including IP addresses, browser types, device information, referring pages and website usage data. Information that you voluntarily submit through forms or other interactions with the Website may include:

- Name;
- Email address;
- Telephone number;
- Postal address;
- Relationship to the School;
- Any other information you choose to provide.

Information collected automatically when you access the Website may include:

- Internet Protocol (IP) address;
- Browser type and version;
- Device type and operating system;
- Internet Service Provider (ISP);
- Date and time of access;
- Referring and exit pages;
- Website activity and usage data.

We may also collect information through cookies, web beacons and similar technologies.

6.1 How We Use Information Collected through the Website

We may use personal information collected through the Website to:

- Operate, maintain and improve the Website;
- Respond to enquiries and requests;
- Provide information about the School and its activities;
- Manage admissions enquiries, events and other requests;
- Monitor and analyse Website usage and performance;
- Maintain Website security;
- Prevent fraud, misuse and unauthorised access;
- Comply with legal and regulatory obligations;
- Protect the rights, property and safety of the School and its community.

The School's legal basis for collecting and using personal information depends on the information concerned and the context in which it is collected. Under UK GDPR, the School may process personal information on one or more of the following lawful bases:

- Performance of a contract;
- Compliance with a legal obligation;
- Legitimate interests pursued by the School;
- Consent, where required by law.

6.2 Who We Share Website Information With

We may share personal information with:

- Website hosting providers and IT service providers;
- Analytics providers, including Google Analytics;
- Professional advisers, including legal, compliance and insurance advisers;
- Regulatory authorities, government bodies and law enforcement agencies where required by law;
- Third-party suppliers providing services on behalf of the School.

We require third parties processing personal information on our behalf to do so securely and in accordance with applicable data protection legislation. Where payments are made through School-approved online payment platforms, payment card information is processed directly by the relevant payment service provider. Payment service providers process personal information in accordance with their own privacy notices and applicable security requirements.

6.3 Use of Log Files

RGS Guildford follows a standard procedure of using log files. These files record visitors when they access the Website. Information collected through log files may include:

- IP addresses;
- Browser type;
- Internet Service Provider (ISP);
- Date and time stamps;
- Referring and exit pages; and
- Number of clicks.

This information is not linked to information that directly identifies individuals. It is used for analysing trends, administering the Website, monitoring security, understanding visitor movement around the Website, tracking usage patterns and gathering aggregated statistics to improve the Website and user experience.

6.4 Cookies and Similar Technologies

To ensure the Website functions effectively and provides a positive user experience, we use cookies and similar technologies, including web beacons. Cookies are small text files placed on your device when you visit a website. They help websites operate efficiently, remember user preferences and provide information about how visitors use the site.

We collect information about your use of the Website through cookies, web beacons and similar technologies. We, and our third-party service providers and partners, may also use these technologies to measure the effectiveness of communications, admissions activity, marketing campaigns and other promotional activities.

Where third parties use cookies or similar technologies, their use is governed by their own privacy policies and is not covered by this Privacy Notice except where required by law.

Strictly Necessary Cookies: These cookies are essential for the operation of the Website and enable core functionality. They do not require consent under applicable law. These include:

- Accessing secure areas of the Website;
- Submitting online forms;
- Maintaining Website security and functionality.

Analytics Cookies: We use Google Analytics, a web analytics service provided by Google, to help us understand how visitors interact with the Website. These cookies allow us to:

- Recognise and count the number of visitors to the Website;
- Understand how visitors navigate the Website;
- Identify which pages and content are most frequently viewed;
- Improve the structure, functionality and performance of the Website.

Google Analytics collects standard internet log information and visitor behaviour data. This information is processed in a way that does not directly identify individual users. We do not attempt to identify individual visitors through information collected by Google Analytics. Further information about how Google uses data can be found at: <https://policies.google.com/privacy>

Functionality Cookies: These cookies enable the Website to recognise you when you return and remember your preferences and choices. They help us provide enhanced functionality and a more personalised experience.

Third-Party Cookies: Some Website content and services are provided by third parties, such as social media platforms and video hosting services, including X (formerly Twitter) and YouTube. These providers may place cookies on your device when you interact with their content. We do not control the use of these cookies and recommend reviewing the relevant third-party privacy and cookie policies for further information.

6.5 Cookie Consent and Management

The law permits us to place strictly necessary cookies on your device without your consent. For all other categories of cookies, we will seek your consent before placing them on your device where required by law.

You may withdraw or amend your cookie preferences at any time through the Website's cookie preference settings.

You can control and delete cookies through your browser settings. Most web browsers allow you to:

- View cookies stored on your device;
- Delete existing cookies;
- Block cookies from specific websites; or
- Block all cookies altogether.

Unless you have adjusted your browser or cookie settings to refuse cookies, our systems may place cookies on your device when you visit the Website. Please note that blocking or deleting certain cookies may affect the functionality of the Website and limit access to some features and services. For more information about managing cookies, please visit: <https://www.aboutcookies.org>

6.6 International Transfers

Where the School uses suppliers or cloud service providers that transfer personal information outside the United Kingdom, we ensure appropriate safeguards are in place as required by UK GDPR. These safeguards may include:

- UK adequacy regulations;
- The UK International Data Transfer Agreement (IDTA);
- The UK Addendum to the EU Standard Contractual Clauses;
- The UK Extension to the EU-US Data Privacy Framework (where applicable);
- Other lawful transfer mechanisms permitted under applicable law.

6.7 Third-Party Websites

The Website may contain links to external websites operated by third parties. The School is not responsible for the content, privacy practices or security of those websites. Visitors should review the privacy policies of any external websites they visit.

6.8 Website Information from Children Under the Age of 13

The School does not knowingly collect personal information directly from children under the age of 13 through the Website without appropriate parental involvement or another lawful basis for processing. If you believe that a child has provided personal information through the Website inappropriately, please contact us and we will take reasonable steps to investigate and, where appropriate, remove the information.

7. OTHER SOURCES OF PERSONAL DATA

With the exception of the Website (as detailed in Section 6), generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities, or third party service providers who credit and identity check parents and their source of funds); or collected from publicly available resources.

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

Processing by third parties. 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). However, some functions are outsourced including cloud storage. In accordance with data protection law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the School's specific directions.

Data sharing. Occasionally, the School – including its governing board – will need to share personal information relating to its community of pupils and parents with third parties, such as:

- appropriate contractors, such as visiting music teachers;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- examination boards;
- Stage 3 complaints panels, which may include independent panel members such as when a complaint is raised (and in accordance with the School Complaints Procedure, this requires the involvement of independent panel members);
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the School; and
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission etc.

If you are a parent and a member of the Parent Teacher Association ("PTA"), the School may share by agreement, your contact details with the PTA. The PTA is a separate data controller, and the School is not responsible for the PTA's processing of personal data.

9. ACCESS TO, AND SHARING OF, SENSITIVE DATA

Particularly strict rules of access apply in the context of "special category" data, most notably:

- health and medical / special needs records; and
- pastoral or safeguarding files.

Medical / health data. The School needs to process such information to comply with statutory duties and to keep pupils and others safe, but the School will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for School trips or for catering purposes. Express consent will be sought where appropriate. However, a certain amount of any relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Safeguarding data. The School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education or 'KCSIE') to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children's Services, CAMHS or the police.

KCSIE also requires that, whenever a child leaves the School to join another school or college, their child protection file is promptly provided to the new organisation, along with any other information which the School's Designated Safeguarding Lead considers material to the ongoing care needs of any pupil. Where appropriate, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school or college is a safeguarding question that must be reserved to the School. The School will

retain a copy of the child protection file in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the School's Safeguarding Policies.

10. 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 for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary parent and pupil files is up to 7 years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the School's DPO. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

For full detail of retention periods by category please see the School's Information and Records Retention Policy.

11. KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the School's Parent Association.
- Contact parents and/or alumni by post and email in order to promote and raise funds for the School;
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the School's fundraising potential.

Should you wish to limit or object to any such use, or would like further information about them, please contact the DPO in writing at the School's main postal address. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

12. YOUR RIGHTS

12.1 Rights of Individuals

Individuals have rights under data protection law in relation to their personal data, including the right to request access to personal data held by the School, request correction of inaccurate information, request erasure in certain circumstances, object to processing, restrict processing, request the transfer of personal data and withdraw consent where processing relies on consent. These rights are subject to certain exemptions and limitations under data protection law.

The rights under data protection law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils, for example under the Parent Contract or via a form. Parents and pupils should be aware that this is not necessarily the same as the School relying on consent.

Where consent is required, it may in some cases be necessary or appropriate, given the nature of the processing in question and the pupil's age and understanding, to seek the pupil's consent either alongside or in place of parental consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the School will assume that a pupil's consent is not required for the ordinary disclosure of their personal data to their parents, for example for the purposes of keeping parents informed about the pupil's activities, progress, behaviour and welfare, unless, in the School's opinion, there is a good reason to do otherwise.

Where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to disclose the information, for example where disclosure is required by law or is considered necessary in the best interests of the pupil or others.

The School will endeavour to respond to requests relating to personal data as quickly as reasonably practicable and, in any event, within the applicable statutory time limits. Where a request is particularly complex, involves large amounts of information or relates to information concerning other individuals, the School may require additional time as permitted by law.

If a request is manifestly unfounded or excessive, the School may refuse the request or charge a reasonable fee where permitted by data protection law.

If you believe that personal data held by the School is inaccurate or incomplete, please let us know. The School will consider requests for rectification carefully. However, the School will not necessarily amend or delete professional opinions, notes, assessments or records solely because an individual disagrees with them, although it may be appropriate to record a differing view where relevant.

Pupils are required to respect the personal data and privacy of others and to comply with the School's Acceptable Use Policy and School rules.

12.2 Requests that cannot be fulfilled

You should be aware that UK GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below – or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action, or where a duty of confidence is owed by a legal adviser).

The School is also not required to:

- disclose any pupil examination scripts (or other information consisting solely of pupil test answers, potentially including in mock exam scripts or other types of exams / tests used to assess performance – although markers' comments may still be disclosable if they constitute pupil personal data); or
- provide examination or other test marks ahead of their ordinary publication date, nor share any confidential reference held by the School that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

12.3 Requests by or on behalf of pupils

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's. For older pupils, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Pupils at the Senior School are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

12.4 Parental Requests.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they

and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child, court orders, or pastoral issues.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

12.5 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). Examples where we do rely on consent are: biometrics, certain types of uses of images, certain types of fundraising activity. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

13. DATA ACCURACY AND SECURITY

The School uses a range of technical and organisational measures designed to safeguard personal data, including access controls, security monitoring, encryption where appropriate and secure methods of data transmission.

The School will also endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the DPO of 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 information 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 around use of technology and devices, and access to school systems.

Automated decision-making. The School does not take decisions in respect of pupils, parents or staff using solely automated processing that produces legal effects or similarly significantly affects the individual. Automated tools used by the School (such as the Lightspeed safeguarding

monitoring system and email security gateways) flag matters for review by a member of staff, who takes any decision that follows.

International transfers. Where the School uses suppliers or cloud services that may transfer personal data outside the United Kingdom, the School only does so where the data is adequately protected. The School relies on UK adequacy regulations where they apply, and on the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or the UK extension to the EU–US Data Privacy Framework, where they do not. The previous EU–US Privacy Shield no longer applies. The list of countries covered by UK adequacy regulations is maintained by the Information Commissioner's Office.

14. REVIEW OF THIS NOTICE

The School may update this Privacy Notice from time to time to reflect changes in legal, regulatory or operational requirements. The most current version will be published on the School's website. Where changes are significant and materially affect how personal data is processed, the School will take reasonable steps to bring those changes to the attention of affected individuals.

15. QUERIES AND COMPLAINTS

Any comments or queries about this Privacy Notice should be directed to the DPO at dpo@rgsg.co.uk, using the School's main postal address, or by contacting the School's Front Office on 01483 880600.

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should utilise the School complaints procedure and should also notify the School's DPO. You can also make a referral to or 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.