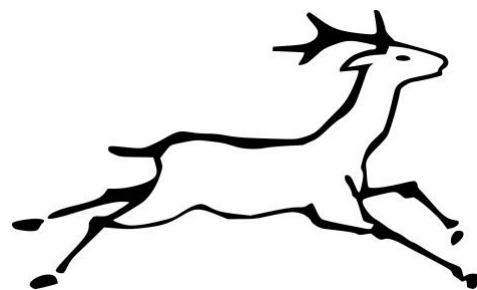


# Running Deer Privacy Policy



Reviewed: 01/07/2026 | Next date for review: 01/07/2027

## 1. IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy gives you information about how Running Deer C.I.C (Company No: 7605814) (Department for Education) registered independent school (registration number: 878/6067) collects and uses your personal data through your use of this website and engagement with our services.

Whilst we process children's personal data, our website is not intended for children.

### Controller

Running Deer C.I.C is the controller and responsible for your personal data (collectively referred to as "Running Deer", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (section 10), please contact the DPO using the information set out in the contact details section (section 11).

## 2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

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

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

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender. Data pertaining to the pupil and the parent/carer.
- **Contact Data** includes address, delivery address, email address and telephone numbers of the pupil and parent/carer.
- **Financial Data** includes bank account and payment card details of the parent/carer.
- **Transaction Data** includes details about payments to and from the parent/carer.
- **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, device ID and other technology on the devices you use to access this website.

- **Usage Data** includes information about how you interact with and use our website and services.
- **Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Education and Assessment Data** includes your academic records and results, CAMHS correspondence, and education and learning plans.
- **Image Data:** Photograph/CCTV footage.
- **Voice Recording Data.**
- **Social Care and Welfare Data** includes correspondence, social care plans, information about safeguarding matters, pupils in receipt of pupil premium, children in need, children looked after by a local authority, and other related documents.
- **Criminal Convictions Data** means data relating to criminal convictions and offences (which may receive special protection).
- **Special Category Data** includes your race, ethnic origin, health, disability, mental health, learning difficulties, neurodevelopmental diagnoses and health needs, sexual health and sexual orientation. Data pertaining to the pupil and the parent/carer.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - create an account for Arbor-education;
  - subscribe to our service or publications;
  - enter a survey; or
  - give us feedback or contact us.

## 4. HOW WE USE YOUR PERSONAL DATA

### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to function as a provider of education services. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to, for example pertaining to pupil welfare and safeguarding. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.
- **Express consent:** In some circumstances, we rely on your explicit consent to process special category data.
- Where processing of special category data is **necessary in the context of legal claims or where another legal ground other than express consent** applies. This may include vital interests, health or social care and legal claims.
- **Vital obligation:** We rely on public task where we need to protect someone's life.
- **Public task:** Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

| Purpose/Use                                                                                                                                                         | Type of Data                                                                                                                                                                                                            | Legal Basis                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>1. To register and enrol a pupil at the school:</b></p> <p>Includes creating a pupil record, issuing a school place, and recording admission information.</p> | <p>a. Identity<br/>b. Contact<br/>c. Profile Data<br/>d. Communications Data<br/>e. Education and Assessment Data<br/>f. Social Care and Welfare Data<br/>g. Criminal Convictions Data<br/>h. Special Category Data</p> | <p>a. Performance of a contract with you<br/>a. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress)<br/>b. Legal obligation</p> <p>Special Category Data and Criminal Convictions Data:</p> <p>a. Express consent<br/>b. Vital obligation<br/>c. Public task</p> |

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| <p><b>2. To fulfil the school's statutory duties in relation to Special Educational Needs and Disabilities (SEND), including:</b></p> <ul style="list-style-type: none"> <li>a. Identifying, assessing, and supporting pupils with SEND</li> <li>b. Creating, reviewing, and implementing Education, Health, and Care Plans</li> <li>c. Coordinating provision with the Local Authority, health professionals, therapists, and other agencies/service providers</li> <li>d. Maintaining reports and records pertaining to the pupil's needs</li> </ul>                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Criminal Convictions Data</li> <li>h. Special Category Data</li> </ul>                                  | <ul style="list-style-type: none"> <li>a. Legitimate interests (to deliver education services)</li> <li>b. Legal obligation</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul>                                                                                                                                    |
| <p><b>3. To meet safeguarding and child protection obligations, including:</b></p> <ul style="list-style-type: none"> <li>a. Maintaining safeguarding records and a chronology of concerns</li> <li>b. Making referrals to children's services, police or other emergency services</li> <li>c. Managing allegations against staff</li> </ul> <p>Running Deer may record meetings with the consent of all attendees. Recordings will only be on Running Deer owned and managed devices. All participants will be informed about the recording and its purpose to maintain transparency.</p> <p>The recording of children or young people under the age of 13 who are present should not take place unless their parents/carers have given their consent.</p> | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Voice Recording Data</li> <li>h. Criminal Convictions Data</li> <li>i. Special Category Data</li> </ul> | <ul style="list-style-type: none"> <li>b. Performance of a contract with you</li> <li>c. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress)</li> <li>d. Legal obligation</li> <li>e. Consent (Voice Recording Data)</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul> |
| <p><b>4. To manage pupils' medical and health needs in school, including:</b></p> <ul style="list-style-type: none"> <li>a. Administering medication and maintaining individual healthcare plans</li> <li>b. Managing medical emergencies</li> <li>c. Coordinating with NHS professionals and therapists</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Criminal Convictions Data</li> <li>h. Special Category Data</li> </ul>                                  | <ul style="list-style-type: none"> <li>a. Performance of a contract with you</li> <li>b. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress)</li> <li>c. Legal obligation</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul>                                            |
| <p><b>5. To support teaching, learning and assessment, including:</b></p> <ul style="list-style-type: none"> <li>a. Tracking pupil progress and attainment</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> </ul>                                                                                                                                                   | <ul style="list-style-type: none"> <li>a. Performance of a contract with you</li> <li>b. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress)</li> </ul>                                                                                                                                                                                                                                                               |

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| <ul style="list-style-type: none"> <li>b. Producing and reviewing individualised plans</li> <li>c. External examinations and access arrangements (e.g. reasonable adjustments)</li> <li>d. Reporting to parents/carers</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>f. Social Care and Welfare Data</li> <li>g. Criminal Convictions Data</li> <li>h. Special Category Data</li> </ul>                                                                                                                                                                              | <ul style="list-style-type: none"> <li>c. Legal obligation</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul>                                                                                                                                                                                                     |
| <p><b>6. To manage attendance, behaviour and exclusions, including:</b></p> <ul style="list-style-type: none"> <li>a. Recording, monitoring, and reporting attendance to the Local Authority</li> <li>b. Managing fixed-term and permanent exclusions</li> <li>c. Referring to the Local Authority for pupils at risk of missing education</li> <li>d. Reporting to parents/carers</li> <li>e. Communicating with the emergency services and external support services</li> </ul> <p>Running Deer may record meetings with the consent of all attendees. Recordings will only be on Running Deer owned and managed devices. All participants will be informed about the recording and its purpose to maintain transparency.</p> <p>The recording of children or young people under the age of 13 who are present should not take place unless their parents/carers have given their consent.</p> | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Voice Recording Data</li> <li>h. Criminal Convictions Data</li> <li>i. Special Category Data</li> </ul> | <ul style="list-style-type: none"> <li>a. Performance of a contract with you</li> <li>b. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress)</li> <li>c. Legal obligation</li> <li>d. Consent (Voice Recording Data)</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul> |
| <p><b>7. To meet duties in relation to:</b></p> <ul style="list-style-type: none"> <li>a. Maintaining and sharing education plans</li> <li>b. Liaising with the Virtual School Head and social workers</li> <li>c. Managing pupil premium funding</li> <li>d. Children in need</li> <li>e. Children looked after by a local authority</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Criminal Convictions Data</li> <li>h. Special Category Data</li> </ul>                                  | <ul style="list-style-type: none"> <li>a. Performance of a contract with you</li> <li>b. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress)</li> <li>c. Legal obligation</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul>                                            |
| <p><b>8. To provide pastoral care and support pupil mental health and wellbeing, including:</b></p> <ul style="list-style-type: none"> <li>a. Recording welfare concerns and interventions</li> <li>b. Coordinating with CAMHS, school counsellors, and external support services</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Voice Recording Data</li> </ul>                                                                         | <ul style="list-style-type: none"> <li>a. Performance of a contract with you</li> <li>b. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress)</li> <li>c. Legal obligation</li> <li>d. Consent (Voice Recording Data)</li> </ul>                                                                                                                                                                                       |

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| <ul style="list-style-type: none"> <li>c. Managing risk assessments for pupils with complex needs</li> <li>d. Liaising with the emergency services</li> </ul> <p>Running Deer may record meetings with the consent of all attendees. Recordings will only be on Running Deer owned and managed devices. All participants will be informed about the recording and its purpose to maintain transparency.</p> <p>The recording of children or young people under the age of 13 who are present should not take place unless their parents/carers have given their consent.</p>                                                                                                                                                                          | <ul style="list-style-type: none"> <li>h. Criminal Convictions Data</li> <li>i. Special Category Data</li> </ul>                                                                                                                                                                                                                       | <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul>                                                                                                                                                                                                                                                                                                            |
| <p><b>10. To communicate with parents/carers about their child's education, welfare and school matters, including:</b></p> <ul style="list-style-type: none"> <li>a. Parents' evenings, review meetings, and other correspondence</li> <li>b. School reports and progress updates</li> <li>c. Consent forms and permissions</li> </ul> <p>Running Deer may record meetings with the consent of all attendees. Recordings will only be on Running Deer owned and managed devices. All participants will be informed about the recording and its purpose to maintain transparency.</p> <p>The recording of children or young people under the age of 13 who are present should not take place unless their parents/carers have given their consent.</p> | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Voice Recording Data</li> <li>h. Criminal Convictions Data</li> <li>i. Special Category Data</li> </ul> | <ul style="list-style-type: none"> <li>a. Performance of a contract with you</li> <li>b. Legitimate interests (to deliver education services and monitor pupil wellbeing and progress, to keep parents/carers informed)</li> <li>c. Legal obligation</li> <li>d. Consent (Voice Recording Data)</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul> |
| <p><b>11. To comply with statutory reporting and data sharing obligations, including:</b></p> <ul style="list-style-type: none"> <li>a. School Census returns to the Department for Education</li> <li>b. Local authority returns (e.g. SEND data, early help, attendance)</li> <li>c. Ofsted inspections</li> <li>d. Reporting to regulatory agencies where required</li> <li>e. National Pupil Database (NPD) submissions</li> </ul>                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Education and Assessment Data</li> <li>f. Social Care and Welfare Data</li> <li>g. Criminal Convictions Data</li> <li>h. Special Category Data</li> </ul>                                  | <ul style="list-style-type: none"> <li>a. Legal obligation</li> </ul> <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul>                                                                                                                                                                                                                                      |
| <p><b>12. To manage the school's financial administration, including:</b></p> <ul style="list-style-type: none"> <li>a. Free school meals and pupil premium eligibility checks</li> <li>b. Processing payments for trips, clubs and other activities</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Communications Data</li> <li>e. Social Care and Welfare Data</li> <li>f. Special Category Data</li> </ul>                                                                                                                  | <ul style="list-style-type: none"> <li>a. Performance of a contract with you</li> <li>b. Legitimate interests (to recover debts due to the school)</li> <li>c. Legal obligation</li> </ul>                                                                                                                                                                                                                                                                                                       |

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| <p>c. Recovering money owed to the school</p>                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                      | <p>Special Category Data and Criminal Convictions Data:</p> <ul style="list-style-type: none"> <li>a. Express consent</li> <li>b. Vital obligation</li> <li>c. Public task</li> </ul>                                                       |
| <p><b>13. To maintain the security of the school site and the safety of pupils and staff, including through:</b></p> <ul style="list-style-type: none"> <li>a. Operation of CCTV systems</li> <li>b. Visitor sign-in and identity verification</li> </ul>                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Image Data</li> </ul>                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>a. Necessary for our legitimate interests (to maintain the safety and security of the school site, staff and pupils)</li> <li>b. Legal obligation</li> </ul>                                         |
| <p><b>14. To administer and protect the school's IT systems, website and digital platforms, including:</b></p> <ul style="list-style-type: none"> <li>a. Troubleshooting, testing, maintenance, and system security</li> <li>b. Monitoring use of school IT systems and devices (including by pupils)</li> <li>c. Filtering and monitoring of online activity in line with the Prevent duty</li> </ul>                                                        | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile Data</li> <li>d. Technical data</li> <li>e. Usage data</li> </ul>                                                                                                                                         | <ul style="list-style-type: none"> <li>a. Necessary for our legitimate interests (provision of IT services, network security, fraud prevention, Prevent duty compliance)</li> <li>b. Necessary to comply with a legal obligation</li> </ul> |
| <p><b>15. To use photographs, video and other media of pupils for school communications, promotional materials and the school website/social media. Uses may include:</b></p> <ul style="list-style-type: none"> <li>a. Video for use in class and at home to assist with reflective practice for staff</li> <li>b. Use in class and team work</li> <li>c. Prospectuses</li> <li>d. Local press, i.e. school events</li> <li>e. School productions</li> </ul> | <ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Image Data</li> <li>c. Voice Recording Data</li> </ul>                                                                                                                                                                                | <ul style="list-style-type: none"> <li>a. Consent</li> </ul>                                                                                                                                                                                |
| <p><b>16. To use data analytics to improve the school's services, provision and communications, including:</b></p> <ul style="list-style-type: none"> <li>a. Monitoring the effectiveness of SEND provision across the school</li> <li>b. Analysing attendance, behaviour, and attainment trends</li> </ul>                                                                                                                                                   | <ul style="list-style-type: none"> <li>a. Technical data</li> <li>b. Usage data</li> <li>c. Aggregated/anonymised pupil data</li> </ul>                                                                                                                                                              | <p>Necessary for our legitimate interests (to improve our educational provision, SEND support and communications, and to fulfil our statutory self-evaluation duties).</p> <p>Where possible, data is anonymised before analysis.</p>       |
| <p><b>17. To investigate and respond to complaints raised and to process your rights under data protection law</b></p> <p>Running Deer may record meetings with the consent of all attendees. Recordings will only be on Running Deer owned and managed devices. All participants will be informed about the recording and its purpose to maintain transparency.</p>                                                                                          | <ul style="list-style-type: none"> <li>a. Identity</li> <li>a. Contact</li> <li>b. Profile Data</li> <li>c. Communications Data</li> <li>d. Education and Assessment Data</li> <li>e. Social Care and Welfare Data</li> <li>f. Voice Recording Data</li> <li>g. Criminal Convictions Data</li> </ul> | <ul style="list-style-type: none"> <li>a. Necessary for our legitimate interests (to handle complaints effectively).</li> <li>b. Legal obligation.</li> <li>c. Consent (Voice Recording Data).</li> </ul>                                   |

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| <p>The recording of children or young people under the age of 13 who are present should not take place unless their parents/carers have given their consent.</p> | <p>h. Special Category Data</p> |  |
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## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- External Third Parties including:
  - IT service providers.
  - School councillors and governors.
  - The emergency services.
  - CAHMS.
  - The Local Authority, Children’s Services, Family Services, and Social Services
  - Health professionals, therapists, and other similar agencies/service providers
  - The government, including the Department for Education and HM Revenue & Customs.
  - Regulatory bodies and other like authorities.
  - Our professional advisers, including lawyers and accountants.
  - Medical experts.
  - Service providers of school activities.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal

data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your 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 any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your 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 your 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 relationship 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 personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep certain information for prescribed periods of time, for example accident records for 3 years from the date of the accident, or curricular records for at least 1 year.

In some circumstances you can ask us to delete your data: see section 9 below for further information.

[In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.]

## **9. YOUR LEGAL RIGHTS**

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. 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 in certain circumstances. 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 those of a third party) as the legal basis for that particular use of your data (including carrying out profiling

based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes. We do not engage in direct marketing.
- 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 (see the table in section 4 for details of when we rely on your consent as the legal basis for using your 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.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of 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; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us – see contact details (section 10).

### **No fee usually required**

You will not have to pay a fee to access your 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 to help us confirm your identity and ensure your right 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.

## **10. CONTACT DETAILS**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact our DPO in the following ways:

- Email address: [DPO@rdcic.org.uk](mailto:DPO@rdcic.org.uk)
- Post: Data Protection Officer, Running Deer, 3 Court Street, Moretonhampstead, TQ13 8NE

## **11. COMPLAINTS**

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint. You can find our complaints procedure and contact details here: [https://out.rdcic.org.uk/complaints\\_procedure](https://out.rdcic.org.uk/complaints_procedure)

## **12. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our privacy policy under regular review. This version was last updated on 01/07/2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

## **13. 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.