



# ST ALOYSIUS' COLLEGE

## **Website & Enquirers Privacy Policy**

**Last updated: May 2018**

**ICO Registration Number: Z7328006**

Thank you for visiting **St Aloysius' College**. Your privacy is important to us. This Privacy Policy is where we explain to you what personal information is collected when you visit our site or make an enquiry, how it is collected, how we may use that information, where we store it, how long we store it for, and how we protect it. We will also explain your rights in relation to your personal information.

Please read the following carefully to understand our views and practices regarding your personal information and how we may collect it and treat it. For convenience, we have divided our website and enquirers data protection policies into three separate pages:

### **1. Our Website & Enquirers Privacy Policy**

This policy explains generally how we collect, use, store, and protect the personal information you give us via the website or when making an enquiry.

### **2. Our Cookie Policy**

You can find out more about how we may collect personal information about you via cookies [here](#) (it also explains what cookies are).

### **3. Our Website & Enquirers Retention Policy**

You can find out how long we may hold onto the personal information [here](#).

## **WHO WE ARE**

St Aloysius' College is a company limited by guarantee (SC405951) registered in Scotland. We are a Jesuit school and a charity registered in Scotland (SC042545). Our registered office is 45 Hill Street, Glasgow, G3 6RJ. But, for the purposes of this Privacy Policy, it's just easier if we refer to ourselves as **"we"**.

## **WHAT THIS PRIVACY POLICY GOVERNS**

This Privacy Policy applies to our site, [www.stalloysius.org](http://www.stalloysius.org) and any other services that we may provide to you through our site (we'll just call these **"our services"** for short) or when you correspond with us by phone, e-mail or otherwise (for example, at College open events) at an initial enquiry stage.

In the context of this Privacy Policy **"personal information"** means information which, on its own or in combination with other information, can be used to identify you, in particular by reference to an identifier such as your name, your address, or location data.

Provided that you consent to us collecting your personal information when you visit our site then this Privacy Policy will govern how we may use that personal information.

Because we are a school located in Scotland the personal information that you give us or that we collect from you will be held under Scottish data protection legislation (but we'll just refer to this as **"the legislation"**). The legislation requires that we tell you that we are a data controller for your personal information or, in other words, we determine the purposes for which and the manner in which any of your personal information are, or are to be, processed by us.

## **HOW YOU CONSENT TO US COLLECTING YOUR PERSONAL INFORMATION**

When you visit our site you should see a pop-up at the bottom of your screen directing you to this Privacy Policy and our Cookie Policy.

By clicking or selecting the **"I Agree"** button that appears in the pop-up then you are demonstrating to us that you are freely giving us informed and specific consent for us to collect and process your personal information for the purposes specified in this Privacy Policy and you are accepting and consenting to the practices described.

If you do not click or select the **"I Agree"** button that appears in the pop-up at the bottom of your screen then we will endeavour to not collect your personal information – this is subject to the caveat below.

If you do not see a pop-up at the bottom of your screen then you may have already accepted our Privacy Policy and our Cookie Policy. You may also be using a pop-up blocker or similar tools that may prevent this policy from being brought to your attention. Please ensure that any pop-up blockers are disabled when you use our site. We cannot be held liable to you if you use pop-up blocks or similar tools that prevent us from complying with our obligations under the legislation.

*Caveat: Even if you do not click or select the **"I Agree"** button there is still some information that we may automatically collect about you – this normally isn't personal information but rather technical information sent by your device and used to connect your computer, tablet, or mobile device to the Internet, including your browser type and version, the time when you visit our site, your time zone setting, certain browser plug-in types and versions, operating system and platform. This type of information is sent by you to our site automatically and it isn't something that we can prevent. We only use this information to administer our site including troubleshooting, load testing, traffic throughput, data analysis, performance testing, and for anonymised research and statistics purposes that we only use internally.*

If you enquire via telephone, email, or otherwise (for example, at College open events) we will collect any information you provide as per this Privacy Policy and accompanying Retention Policy. We will not send you marketing communications unless you have specifically requested them.

## **INFORMATION WE MAY COLLECT**

If you consent to us collecting your personal information then we may process the following data about you:

### **Information you give to us:**

You may give us personal information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise (for example, at College open events). This includes information you may provide to us when you register to use our site, subscribe to our services, search our site, participate in any discussion boards or other social media functions on our site, enter a competition, promotion or survey, fill out a form at our open events, and when you report a problem with our site.

The information you give us may include:

- Your name;
- Address;
- E-mail address;

- Phone number;
- Your child's name and date of birth;
- Your child's current/previous school;
- IP address;
- Financial and credit card information; and
- Photographs and/or videos

### **Information we collect about you:**

When you visit our site we may collect information about you, including which pages you have visited (including date and time) which services and pages you viewed or searched for, page response times, download errors, files downloaded, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse -overs), and methods used to browse away from a page and any phone number used to call our customer service number.

The purpose of this information is to allow us to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, improving our site to ensure that content is presented in the most effective manner for you and for your computer, and as part of our efforts to keep our site safe and secure.

### **Information we receive from other sources:**

We use a third party service, Google Analytics, to collect standard internet log information as well as information on visitors' behaviour including pages they visit and how long they stay on our website. We do this in order to improve our user experience and service offering and cannot identify individuals from the information. Neither St Aloysius' College, nor Google, make any attempt to identify visitors to the site.

### **Information you may pass to third-partied outside our control:**

On many of the pages on our site you will see 'social buttons'. These enable you to share or bookmark pages on our site. These may include buttons for: Twitter, Facebook, Instagram or other social features.

In order for us to implement these buttons on our site and connect them to the relevant social networks and external sites, there are scripts that are executed from domains owned by third-parties and outside of our control.

You should be aware that these sites are likely to be collecting information about what you are doing all around the Internet, including on our site. So if you click on any of these buttons, these sites will be registering that action and may use that information. In some cases these sites will be registering the fact that you are visiting our site, and the specific pages you are on, even if you don't click on the button but are already or automatically logged into their services, like Google and Facebook.

We recommend that you check the respective policies of each of these sites to see how exactly they use your personal information and to find out how to opt out, or delete such personal information.

If you are a parent of a pupil who attends our school, an alumni, a member of staff, or a pupil who is 12 years or older and attending our school then this Privacy Policy will apply alongside our additional privacy policies. These other policies would have been brought to your attention separately, however, if you are unsure then please do not hesitate to contact us.

## **HOW WE MAY USE YOUR PERSONAL INFORMATION**

When you give us your personal information then we may use it to:

1. Carry out our obligations from any contracts entered into between you and us and to provide you with information that you request from us.
2. Provide you with information about our school.

3. Ensure that content from our site is presented in the most effective manner for you and for your computer.

If you provide us with your e-mail, telephone, mobile number, or address then we may contact you by these means. However, we will not use your personal information for marketing purposes without your express consent.

## **MARKETING**

If you opt-in to receive information about us then, depending on what personal information we hold about you, we may decide to contact you via:

- Email
- Post
- Telephone

If you opt-in to receive communication then we may need to pass your personal information to select third parties who are responsible for facilitating communication with you on our behalf. For example, we may need to pass some of your personal details if you wish to be contacted via SMS because we need to partner with a third party business to provide us with this ability.

The third parties that we use are as follows:

1. **MailChimp**

**Purpose:** Email

**Information passed:** email addresses, first name, and surname.

2. **Google Analytics** (view our Cookie Policy here)

**Purpose:** Website Analytics

**Information passed:** Information on how you use the site.

If you have opted-in to receive communications but that organisation is not listed above then this might be because we are using that organisation or service on a one-off basis – in which case, we will let you know. If you are unsure then please get in touch with us.

The purpose of opting into receiving communications from us is to help us better understand you, engage with you, share details about the school, and to assist us in providing the types of communications that you wish to receive from us. We will not knowingly sell your personal information for marketing purposes or pass your personal information to third parties.

If you are receiving communications from us in error or you have opted-out then please get in touch with us and we apologise for any inconvenience caused.

## **WHERE WE STORE YOUR PERSONAL INFORMATION**

Information you provide us is stored securely on College premises or via third-parties mentioned above.

If you choose to receive marketing emails from us, we use a third party company, MailChimp, to send these. They will store such information in the United States.

Where we allow an organisation to process your personal information outside of the European Economic Area, we will ensure that we create and maintain appropriate safeguards with those organisations so that your personal information is subject to the same standards and protections as when we are processing your personal information inside the European Economic Area.

In line with GDPR, we have a Data Processing agreement with MailChimp.

## **YOUR RIGHTS**

Under data protection laws, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights [here](#).

## **HOW LONG WILL YOU HOLD ONTO MY PERSONAL INFORMATION?**

You can find details on how long we may hold onto your personal information on our Website & Enquirer Retention Policy which can be found [here](#). If you are a parent of a pupil who attends our school, an alumni, a member of staff, or a pupil who is 12 years or older and attending our school then this Retention Policy will apply alongside our additional privacy policies (which will each have different retention periods). These other policies can be found [here](#).

## **CHANGES TO OUR PRIVACY POLICY**

We may need to change this Privacy Policy if it's necessary for legal reasons or to reflect changes to our site and services. In any case, the provisions of this Privacy Policy may be changed without prejudice to your rights. When we change our Privacy Policy we will make the updated Privacy Policy available on our site and we will also update the "Last Updated" date.

Once we change our Privacy Policy, it will become legally binding on you 30 days after we post it on our site. During that period you're welcome to contact us if you have questions about the changes.

## **CONTACT US**

If you have any questions, comments or requests regarding our Privacy Policy then please do not hesitate to get in touch with us.

If you wish to contact us about your personal data or exercise any of the rights described above please contact the Data Compliance Lead.

Telephone: **0141 332 3190**

Email: [data@stalloysius.org](mailto:data@stalloysius.org)

Mail: St Aloysius' College, 45 Hill Street, Glasgow G3 6RJ

Policy Owner: Head of Marketing and Communication, Laura Wylie

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This policy will be annually reviewed by: Head of Marketing and Communication