

PRIVACY NOTICE

1. What is this Notice About & Why Should You Read It?

We are committed to safeguarding the privacy of persons for whom we process personal data. In this privacy notice we explain how we will treat personal data processed by us, in accordance with data protection legislation.

This Privacy Notice applies to **Parents Booking** solely.

If you are looking for Netmedia's specific Privacy Policy, it is located separately here.

Separately, our Australian server's Privacy Policy is here.

2. What Types of Personal Data Do We Process and What are the Purposes of the Processing?

Parents Booking processes parent/carer, student and teacher data from schools (and/or local authorities) who subscribe to or trial Parents Booking. The customer (the school or local authority) are the data controllers, Parents Booking is the data processor.

Parents/carers who use Parents Booking may change the email address record, so that it is different from the record processed from the school. In these instances, the parent is providing this update and agreeing to Parents Booking processing this record (solely for the purposes of providing Parents Booking's service).

Parents Booking processes the following types and categories of personal data, but please be aware not all data is processed by all schools:

- Title, forename and surnames of parents/carers
- Email address and phone number of parent/carers
- Forename and surname of pupils/students
- Dates of birth of pupils/students
- Title, forename and surnames of teachers
- Teacher email address
- Teacher telephone number (only where multi-factor authentication is required)
- Room name
- MIS database ID numbers for parents, pupils and teachers
- Class name
- Information which parents/carers enter into the appointment comment box (for teacher to read)
- Usernames and passwords (if used)
- Translator/interpreter requirements

- Personal data obtained through the usage of Cookies on our website for more information, please view our Cookie Notice (at the bottom of this page)
- Personal data enabling us to administer our website and ensure that our website
 is presented in the most effective manner for you, such as IP address,
 geographical location, browser types and version, operating system, referral
 source, length of visit, page views and website navigation paths
- Unique 'meeting ID' numbers for any video meetings which take place
- Optionally, some schools sometimes process the following data
 - Pupil premium, English as an additional language, gender and SEN information, and/or similar 'flags'. This data is only processed where the school intends to use it to prioritise certain families' invites/reminders and analyse uptake using these 'flags', in the pursuit of better engaging and supporting these families.

From time to time we may process special category data about people. We will only process special category personal data when allowed to do so by law, including where you have given us consent to do so, where it is necessary in order to enable us to carry out our obligations and specific rights in the field of employment, social security and social protection law, in order to protect a person's vital interests, or if the data has already manifestly been made public by you. We may also process this type of data to establish, exercise or defend a legal claim. There are certain other exceptions which exist in law, and we reserve the right to rely on these exceptions, if and when required, but do not envisage such processing of special category personal data taking place within our organisation.

We will only process personal data which is adequate, relevant and limited to what is necessary for the processing purposes.

3. Where Do We Obtain Your Personal Data From?

3.1 Data Which We Collect From You Directly

The majority of the personal data which we process is obtained from the student's school, but parents may provide us with additional personal data (such as a change in email address).

3.2 Data Which We May Obtain From Others

We routinely receive or process personal data about you from schools. We process such personal data in accordance with the law.

Please note that if you are disclosing personal data regarding another person to us, you must first obtain that person's consent for both the disclosure and the processing by us of that personal data, unless another lawful basis exists for such a disclosure, such as a legal obligation. You are responsible for ensuring that you are authorised to disclose any such data to us.

4. What Lawful Bases Do We Have For Processing Your Personal Data?

We process your personal data on a number of lawful bases, but primarily based on our legitimate interests, namely the provision of a parents' evening booking system (sometimes including video meetings between parents and teachers), event, club or wraparound booking and similar.

We reserve the right to process personal data additionally on the following lawful bases:

- The performance of contract, or to enter into pre-contractual negotiations;
- In order for us to comply with a legal obligation imposed upon us;
- In order for us to protect your vital interests or those of another person
- With your consent. Where the lawful basis for our processing your personal data is consent, you have the right to withdraw your consent at any time.

5. What Rights Do You Have?

You have certain rights under data protection legislation, which you can generally exercise in respect of the data which we process about you by contacting us.

Your rights are summarised below:

- Right of access you can request a copy of the information that we hold about you
- Right to rectification you can ask us to correct any personal data which we
 hold about you if you think that it is inaccurate or incomplete. Please note
 that you are responsible for letting us know if the personal data which we
 hold about you needs to be corrected or updated.
- **Right to be forgotten** in certain circumstances you can ask us to delete the personal data which we hold about you
- Right to restriction of processing in certain circumstances you have a right to restrict us processing your personal data
- **Right of data portability** you can ask us to transfer the personal data that we hold about you to other organisations in certain circumstances
- **Right to object** you have the right to object to us processing your personal data in certain circumstances
- Right to object to us making a decision about you based solely on automated processing, including profiling in certain circumstances

If you do not wish to use Parents Booking or its video meeting facilities, please contact your school so as to make alternative arrangements.

6. Who Do We Share Your Personal Data With and Why?

We may disclose your personal data to our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent;
- to the extent that we are required to do so by law;
- to protect the rights, property and safety of us, our customers, users of our websites and other persons;
- in connection with any ongoing or prospective legal proceedings;
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- to another organisation if we enter into a joint venture or merge with another organisations;
- to any member of our group, which means those companies which are a subsidiary of our holding company, as defined by s.1159 of the Companies Act 2006.

If we wish or need to share your special category personal data with another organisation, we will only do so if we have either obtained your consent or we are required or allowed to do so by law.

7. Transferring Your Data Outside of the European Economic Area/The UK

Parents Booking uses Amazon AWS Cloud Hosting based in Dublin (Ireland) for all schools, except those based in Australia and North America (where there are separate, local servers).

Where we need to transfer and/or share personal data to countries and/or organisations outside of the European Economic Area, we only do so in accordance with the UK General Data Protection Regulation ('UK GDPR').

8. How Long Do We Process Your Personal Data For?

We will only process your personal data for the purpose or purposes stated, and this data shall not be kept for longer than is necessary for such purpose or purposes. Generally, we keep your data until the student, parent or teacher has left the school, and/or the school's account is closed or expires, whichever comes first. Data records are updated regularly, and Parents Booking searches for student leavers regularly to remove records in a timely fashion.

9. Security of Personal Data

We will take reasonable technical and organisational measures and precautions so as to prevent the loss, misuse or alteration of your personal data.

We process all personal data using an encrypted, secure connection and data is encrypted at rest in our cloud servers.

Please note that the transmission of any type of information over the internet is inherently insecure. We therefore cannot guarantee the security of data sent over the internet, but every effort is made to provide the most secure service possible.

10. Are We Allowed to Change this Notice?

From time to time we need to make amendments to our Privacy Notice, which we will do by publishing a new version on our website. Please check this page occasionally so as to ensure that you are happy with any changes which we have made to the Notice.

11. What Should You Do If You Have Any Complaints or Want to Find out More?

We continuously seek to ensure that we adhere to the general principles of data protection legislation, including that your personal data will be processed lawfully, fairly, in a transparent manner, subject to the purpose limitation, is minimised, is accurate, is not stored for longer than is necessary for the purposes and is processed with integrity and confidentially, as appropriate.

If you wish to exercise any of your rights as a data subject, wish to receive any more information or wish to make a complaint, please contact our data protection officer.

Our Data Protection Officer is William Mackenzie and he can be contacted using the details below.

We will always endeavour to resolve any queries which you may have, but please note that you also have the right to complain directly to the Information Commissioner's Office and seek other legal remedies.

12. How Can You Contact Us?

We are Netmedia Ltd, registered in Scotland under registration number SC483579. Our registered address is at Old Drynie House, Kilmuir, North Kessock, Inverness IV1 3XG. Our principal place of business is at our registered address. Our company website address is http://netmedia.co.uk and our Parents Booking website addresses is https://parents-booking.com.

You can contact us in any of the following ways:

- by post, using the address given above
- using the 'contact us' form on our website
- by calling us on 01436 731000
- by emailing us at dataprotection@netmedia.co.uk

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