

Thank you for visiting Wellington School's website.

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, 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 included our cookies policy within this document (including retention data) as well as links to other policies implemented by the school, including our Fair Processing Policy [link coming soon].

- Our Privacy Policy: this policy explains generally how we collect, use, store, and protect your personal information when you visit our site.
- Our Cookie Policy: our Cookie Policy is available within this document and explains more about how we may collect personal information about you via cookies (it also explains what cookies are).

If you have any questions please do not hesitate to contact us at dp@wellingtonschool.org or, if you prefer to call or write to us, then you can find our contact details at the bottom of this page.

Who We Are

- We are Wellington School (Ayr) Ltd.
- Wellington School (Ayr) is a company limited by guarantee with charitable status.
- Company Number SC026589.
- Scottish Charity No. SC005052.
- Our registered office is at Carleton Turrets, 1 Craigweil Road, Ayr, KA7 2XH

For the purposes of this Privacy Policy, it is easier if we refer to ourselves as “we”.

What This Privacy Policy Governs

This Privacy Policy applies to our site, www.wellingtonschool.org and any other services that we may provide to you through our site (we'll just call these “our services” for short).

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 Cookie Notice pop-up at the bottom of your screen directing you to this Privacy Policy which includes our policy on the usage of cookies.

By selecting the “Accept & Close” button that appears in the pop-up you are demonstrating to us that you are freely giving us informed and specific consent for us to collect and process your personal information both submitted via forms and stored in Cookies for the purposes specified in this Privacy Policy and you are accepting and consenting to the practices described.

If you do not wish for us to be able to collect and process your personal information by using cookies please select the left aligned button on the Cookie Notice Pop-Up directing you to an external link: <http://www.allaboutcookies.org/manage-cookies>. This external source lists detailed instructions as to how to update your cookie settings. The button link provided in the Cookie Notice Pop-Up is intuitive and will link to relevant instructions according to the browser you are accessing our site from.

If you choose not to interact with the prominent Cookie Notice Pop-Up and continue to use our website, we will have no other option but to use cookies to collect and process personal information. Our website does not have the functionality to disable all or specific types of cookies. **The only way to disable all or some cookies is to navigate off our website and update your browser settings.**

If you do not see a pop-up at the bottom of your screen then you may have already accepted our Privacy Policy (and Cookie Policy therein.) Our website uses a cookie to remember past users to the website so not to make users interact with the pop-up each time they visit the website. However, please note that to ensure users are reminded of our use of cookies, we have set a cookie expiration date of three months. The Cookie Notice Pop-Up will therefore display to users every three months should they regularly visit our website.

Our Cookie Notice Pop-up is loaded via .php and not javascript therefore it is unlikely that pop-up blockers or similar tools will prevent this policy from being displayed. However, to account for the very small chance that a pop-up blocker could identify and decipher .php code to be a “pop-up” we ask that you 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 blockers or similar tools that prevent us from complying with our obligations under GDPR legislation.

We will only hold your personal information as detailed in our Fair Processing Policy.

Please see the section below titled “Cookies” for information on the type of data we collect using cookies

Cookies

wellingtonschool.org puts small files (known as ‘cookies’) onto your computer to collect information about how you browse the site. Cookies are used to:

- measure how you use the website so it can be updated and improved based on your needs
- remember the notifications you’ve seen so that we don’t show them to you again

wellingtonschool.org cookies aren’t used to identify you personally.

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. 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, and when you report a problem with our site.

As discussed in the previous section, a Cookie Notice Pop-up will display upon entry to our site to inform visitors about our cookie usage and direct them to instructions on how to disable/amend cookie preferences should they wish.

How Cookies Are Used On wellingtonschool.org

Measuring website usage (Google Analytics)

We use Google Analytics software to collect information about how you use wellingtonschool.org. We do this to help make sure the site is meeting the needs of its users and to help us make improvements.

Google Analytics stores information about:

- the pages you visit on wellingtonschool.org
- how long you spend on each wellingtonschool.org page
- how you got to the site
- what you click on while you're visiting the site

We don't collect or store your personal information (eg your name or address) so this information can't be used to identify who you are.

We don't allow Google to use or share our analytics data.

Google Analytics sets the following cookies:

Universal Analytics		
NAME	PURPOSE	EXPIRES
_ga	This helps us count how many people visit wellingtonschool.org by tracking if you've visited before	2 years
_gat	Used to manage the rate at which page view requests are made	10 minutes
Google Analytics		
NAME	PURPOSE	EXPIRES
_utma	Like _ga, this lets us know if you've visited before, so we can count how many of our visitors are new to wellingtonschool.org or to a certain page	2 years
_utmb	This works with _utmc to calculate the average length of time you spend on wellingtonschool.org	30 minutes
_utmc	This works with _utmb to calculate when you close your browser	When you close your browser
_utmz	This tells us how you reached wellingtonschool.org (eg from another website or a search engine)	6 months

To Feature Embedded Video Content

Our website has the functionality to display embedded videos from YouTube. Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

YouTube sets cookies when you watch an embedded video on www.wellington.org:

NAME	PURPOSE	EXPIRES
_use_hitbox	This is a randomly generated number that identifies your browser	When you close your browser
VISITOR_INFO1_LIVE	Lets Youtube count the views of embedded Youtube videos	9 months

Contact Forms

We use Ninja Forms on our website to collect data from website visitors through predefined fields. We have three forms featured on our website: Contact Us; Request a Prospectus; and Former pupils. We do not share data collected via our online forms with any other business or third parties, apart from Ninja Forms itself and unless when required/instructed to do so by law. Data collected via our forms is both

Stored in the CMS and can be downloaded as a csv file for marketing purposes.

- In regards to the 'Former Pupils' form, we will only contact you according to the preferences you have agreed to using the checkboxes at the form's footer.
- All other forms - we may contact you as stipulated in the section titled "How we may use your personal information"

Sent to our email servers. Our policy is to delete data from our CMS every three years, whilst the archiving and deletion of data from our email servers is subject to whether or not the data is still relevant or necessary.

The information you give us may include:

- Your name
- Address
- E-mail address
- Phone number
- IP address
- 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 us.

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 you may pass to third-parties outside our control:

Data collected from any of the other sites we operate may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, sub-contractors in technical, payment and delivery services, analytics providers, search information providers, and credit reference agencies) and may receive information about you from them.

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 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 16 years or

older (the GDPR states that the age of consent is 16; as at the 28th of January 2018 the draft Data Protection Bill that will be adopted by the UK post-Brexit states that, for Scotland, 12 will be the presumed age of consent (See Section 201 of the Data Protection Bill). Strictly speaking it will be 16 until the new Data Protection Act comes into effect. However, we do not know at this time when that will be) 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 get in touch with 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 or mobile number then we may contact you by these electronic means (e-mail or SMS). However, we will not use your personal information for marketing purposes without your express consent.

If you do not wish to receive any information by electronic means then please get in touch with us.

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:

- E-mail
- SMS
- Telephone
- Post

You may opt-in to receive general school information or we may ask you to opt-in on a case by case basis. We will do our best to let you know what method or methods of communication we will use. Don't forget, you can always opt-out from receiving communications from us after you have opted-in or you can tell us that you only want to receive communications in a particular manner, or about a particular element of the school. Depending on the type of campaign we might give you the ability to select how you would like to be contacted but this might not always be possible due to technical issues.

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, once The Turret has been printed, your name and address is passed on to our printer so that the publication can be posted to you. In this instance, an encrypted email/excel file is sent to Kestrel Press, Irvine (the password to open the file is sent separately).

The third parties that we use are as follows: Kestrel Press and Groupcall Messenger.

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.

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.

Disclosure of Your Information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. The reason for this is that different parts of the school are responsible for different functions within the school and we need to be able to freely pass your personal

information within these various units for operational efficiency.

Although we may share your personal information within members of our group, this does not mean that we will use it for advertising or marketing purposes. Unless you opt-in to receive marketing communication we will not contact you unless it is necessary for us to get in touch with you. For example, we may need to get in touch with you if you asked us to provide you with further information about your potential attendance at our school. Please remember that our Cookies Policy covers matters such as using your personal information for analytics purposes.

In some cases we may disclose information about you with select third-parties:

- We may anonymise and aggregate your information with other users (for example, we may track that 500 men aged under 20 have clicked on a specific page on our site on any given day). We may use such aggregate and anonymised information to help reach a particular target audience or understand who uses our site.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce any agreements with you, or to protect our rights, property, or safety of our pupils, our employees, or others.

Where We Store Your Personal Information

The personal information that we collect from you will be stored within the European Economic Area. We will not knowingly transfer your personal information outside of the European Economic Area. Where it may be necessary for us to transfer your personal information outside of the European Economic Area we will get in touch with us and seek your consent.

All personal information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted from our site and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access. We apply a 'Privacy by Design' approach to protecting your personal information in order to promote privacy and data protection compliance from the start.

Your Rights

You have the right to ask us not to process your personal information or to restrict the purposes for which we may process your personal information. You can exercise your right to prevent processing of your personal information by not selecting or clicking on the "Accept & Close" button when you visit our site.

You can also exercise your right at any time by contacting us. If you consented to us collecting and/or processing your personal information but you change your mind then you can get in touch with us about erasing the personal information we hold about you.

Please be aware that, even if we receive a request from you to delete your personal information, it may be that we cannot entirely remove all of your personal information. This is usually because we have a legitimate interest to hold onto some of that personal information, for example, if you have an ongoing contract with us, there are outstanding payments due by you to us, the personal information relates to a third-party such as a pupil who attends our school, or we have a legal obligation to retain some or all of your personal information – but we'll let you know.

Access To Information

The legislation gives you the right to access a copy of the personal information that we hold about you. In order to request a copy you need to submit a request – details on how to get in touch can be found at the bottom of this page. However, please remember that certain types of data cannot be disclosed to you as part

of your request. For example, we cannot disclose information to you which identifies another individual or information that may be subject to legal professional privilege. In many cases we may be required to redact some of the documentation that you receive in order to comply with the legislation.

Additionally, we can't just release your personal information to anyone. We can only release your personal information to you or an authorised third party who can demonstrate that you consented to have your personal information released – this is a legal requirement. Therefore, it is important for us to ensure that we confirm your identity before we can release any personal information.

If you send us a request to provide you with a copy of your personal information then we may ask you to provide some identification. We may ask you to provide a copy of your current and valid passport and/or driving license plus a utility bill (that is no more than 3 months old) and has your current address. We may also ask you to visit one of our offices or obtain a solicitors or notary publics' confirmation of your identification.

All of this might sound very onerous but please understand that we have an obligation to protect your personal information and we need to be certain that it is being released to the right person.

What If I Do Not Consent or Withdraw My Consent?

If you do not consent to us collecting your personal information then we cannot guarantee the full functionality of our site and cannot be held responsible or liable to you for any reduction or restriction in access to our site or any of our other services.

Our site may, from time to time, contain links to and from the sites of our partners and affiliates. If you follow a link to any of these sites, please note that these sites have their own privacy and cookie policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these sites.

How Long Will You Hold On To My Personal Information?

Depending on how you engage with us it may be necessary for us to store your personal information for shorter or longer periods of time. Either way, we will only store your personal information for a legitimate and lawful reason. Please remember that this Privacy Policy only applies to how we may collect, store, use, and retain your personal information when you visit our site. If you are a parent of a pupil or you are a pupil who is 16 years or older and attend our school then you will be bound by the terms of additional policies that specifically relate to how we may use your personal information.

You can find details on how long we may hold onto your personal information on our Fair Processing Policy which can be found here [link to be provided asap]

Changes To Our Website 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.

If you don't agree with our changes to the Privacy Policy (regardless of whether you get in touch with us) then unfortunately we may need to restrict or limit your use of the parts of our site that require your personal information in order for us to deliver our services to you. We're sorry we have to say that, but we hope you'll appreciate that in order for certain parts of our site to work properly and in order for us to identify you in connection with our services we need to have everyone using our site and our services under the same rules

instead of different people having different rules - that's why we encourage you to get in touch with us if you have queries.

Contact Us

This Privacy Policy was prepared with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of your personal information. However, we are happy to provide additional information or explanation.

If you have any questions, comments, complaints or requests regarding our Privacy Policy then please do not hesitate to get in touch with us. To make things easier for both of us we would appreciate it if your queries were addressed to:

David Kennedy
Data Protection Officer
Wellington School
1 Craigweil Road
Ayr KA7 2XH

email: dp@wellingtonschool.org
telephone: 01292 269321

If you are not satisfied with the way that we have handled any of your requests or queries relating to our use of your personal data then you can contact the Information Commissioner's Office at www.ico.org.uk. The Information Commissioner's Office is the statutory body responsible for overseeing data protection legislation and law in the United Kingdom.