



NPAT WEBSITE PRIVACY NOTICE AND COOKIE POLICY

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1. INTRODUCTION

Northampton Primary Academy Trust and our schools are committed to safeguarding the privacy of our website visitors. This policy applies where we are acting as a **data controller** with respect to the personal data of our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.

We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.

Under UK data protection law, individuals have a right to be informed about how our school, and the multi-academy trust we are part of, uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains what personal data we will hold about you, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

Our Trust, Northampton Primary Academy Trust, Headlands Primary School, Bushland Road, Northampton, NN3 2NS, is the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer, Angela Corbyn, is contactable by email at:

DPO@npatschools.org

In this policy, "we", "us" and "our" refer Northampton Primary Academy Trust.

2. CREDIT

This document was created using a template from SEQ Legal at:

<https://seqlegal.com/free-legal-documents/privacy-policy>

3. HOW WE USE YOUR PERSONAL DATA

3.1 In this section we have set out:

- a) the general categories of personal data that we may process;
- b) the purposes for which we may process personal data; and
- c) the legal bases of the processing.

3.2 We may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation

paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our embedded analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website.

3.3 We may process information contained in any enquiry which you submit to us regarding our offering ("**contact us data**"). The enquiry data may be processed for the purposes of offering relevant responses to you. The legal basis for this processing is consent.

3.4 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.5 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. PROVIDING YOUR PERSONAL DATA TO OTHERS

4.1 We will not disclose your personal data to any third party.

4.2 Your personal data held in our website database will be stored on the servers of our hosting services providers.

4.3 In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

5.1 None of your personal data is transferred to any country outside of the European Economic Area (EEA)

Where we transfer personal data to a third party country or territory, we will do so in accordance with UK data protection law

6. RETAINING AND DELETING PERSONAL DATA

6.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.2 We will retain your personal data as follows: (a) usage data will be retained for a minimum period of 1 day following the date of collection, and for a maximum period of 12 months following that date; (b) contact us data will be retained for a minimum period of 1 working day following the date of the enquiry, and for a maximum period of 1 month following that date;

6.3 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. YOUR RIGHTS

You have the right to request access to personal data that we hold about you, subject to a number of exceptions. To make a request for access to your personal data, you should contact:

dpo@npatschools.org

Please also refer to our Subject Access Request Policy, available on the Trust website, for further details on making requests for access to your personal data.

You also have the following rights:

the right to be informed about the collection and use of your personal data – this is called ‘right to be informed’.

the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.

the right to ask us to delete your personal information – this is called ‘right to erasure’

the right to ask us to stop using your information – this is called ‘right to restriction of processing’.

the ‘right to object to processing’ of your information, in certain circumstances rights in relation to automated decision making and profiling.

the right to withdraw consent at any time (where relevant).

the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

right to erasure does not apply when the lawful basis for processing is legal obligation or public task.

right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.

right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

If you want to exercise any of these rights then you should contact dpo@npatschools.org

The law does not oblige the Trust to comply with all requests. If the Trust does not intend to comply with the request then you will be notified of the reasons why in writing.

8. COOKIE POLICY

8.1 INTRODUCTION

When you first visit our website, we will ask you to consent to our use of cookies in accordance with the terms of this policy. If you give consent, then cookies will be stored on your device.

To do this, you should click the "I Agree" button. You can manage your preferences by using the "Manage Cookies" button.

8.2 ABOUT COOKIES

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to your web browser and is stored by your web browser.

The next time (and subsequent times) that you visit the website, the PC checks to see if it has a cookie which relates to the website and, if the cookie is present, it is then sent back to the server.

The server then recognizes the connection as one that has been made on an earlier occasion and can provide relevant information based on the content of the cookie. It is the website's way to ask you, automatically, 'have you been here before'; if you have, then the server will act accordingly.

8.3 TYPES OF COOKIE

Cookies may be either "persistent" cookies or "session" cookies and all cookies have an expiry date and time feature.

- a) persistent cookies will be stored by your web browser and will remain on your device (computer) until the cookie's expiry date, unless the cookie is deleted by you before the expiry date;
- b) a session cookie, on the other hand, will be stored by your web browser and will expire at the end of your session, such as when you log out of the website or when the web browser is closed.

Cookies do not typically contain any information that personally identifies you, but other personal information that we store about you may be linked to the information stored in and obtained from cookies.

Does Northampton Primary Academy Trust perform such links?

No. We have no need to link information from cookies to other information that we might hold about you elsewhere in our school.

Do Third Parties perform such links?

Cookies can be used by third party web servers to identify and track you and other users as you/they navigate the different pages on a website and can then identify users returning to a website. This is an automated process.

8.4 COOKIES THAT WE USE

We use both session and persistent cookies on our website.

As noted above we use persistent cookies for general access to the website, when visiting standard pages.

We use session cookies for you if (and only if) you log into our website to gain access to more secure information that is not available to the general public. By log in, we mean that you will enter a username and password that is unique to you. These cookies are only valid during your logged in session and are automatically removed once you log out.

The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

Name of Cookie	Purpose	Expiry Time
_ga	An analytics cookie from Google used to distinguish between you and any other website visitor to our website	2 years
_gid	A different analytics cookie from Google used to distinguish between you and any other website visitor to our website	24 hours
_gat	An analytics cookie from Google used to restrict the number of cookie requests which would otherwise cause poor response time on the website.	1 minute
A 32 character random string of data Example: a6f2658f91d37472 bbdc68e917ff2e85	A website authentication cookie set to recognise your device when you visit our website and if you log into the website with a username and password.	at the end of your login session
cookiesDisclosureCount	A website cookie that indicates the number of times the cookie notification has been displayed to you	6 minutes

Analytics Cookies

Our analytics service provider is Google and they generate statistical and other information about website use by means of cookies.

Our analytics service provider's privacy policy is available at:

<http://www.google.com/policies/privacy>

8.5 OTHER THIRD PARTY COOKIES

Blocking cookies

Most browsers allow you to refuse to accept cookies; for example:

- In Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- In Firefox (version 47) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from

- c) sites"; and
- d) In Chrome (version 52), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies may have a negative impact upon the usability of our websites.

If you do block cookies, you may not be able to use all the features on our website satisfactorily. You will possibly find that certain pages fail to load or you may experience difficulties in logging in and staying logged in.

8.6 DEVICE INFORMATION

As part of the Google Cookies interactions, we are able collect information about the device you're using to reach our website, including the type of device, operating system, browser in use and screen resolution. We use this information to help plan ahead for new and emerging technologies and so we can devise the best services for our customers based on evidential records of historical connections. For example, different types of information are available depending on whether you're using a Mac or a PC, or an iPhone or Android phone. To learn more about what information your device makes available to us, please also check the policies of your device manufacturer or software provider.

This information never identifies you personally.

8.7 DELETING COOKIES

You can delete cookies already stored on your computer; for example:

- a) In Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>)
- (b) In Firefox (version 47), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
- (c) in Chrome (version 52), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

Deleting cookies may have a negative impact on the usability of our websites

8.8 COOKIE PREFERENCES

You can find out how to manage your preferences relating to the use of cookies by visiting this useful website : <http://www.aboutcookies.org.uk/managing-cookies>

9. CONCERNS

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Please contact: Data Protection Officer – email: dpo@npatschools.org

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF