



PRIVACY NOTICE

Responsible:	Director
Date Reviewed:	January 2025
Review Period:	Annually
Approval Authority:	Governors
External Release:	Yes

PRIVACY POLICY

This Privacy Policy ('the Policy'), along with our other terms and conditions and any referenced documents, outlines how we will process any personal data that we collect from you or that you provide. We encourage you to read this Policy thoroughly to understand our views and practices concerning your personal data and how we intend to manage it.

We will only use your personal data solely in accordance with this Policy and in a way that is fair to you. Personal data will only be collected when it is essential for our interactions with you and our dealings with you. We will only keep your personal data for as long as it remains relevant to the purpose for which it was collected, or as required by law.

The Policy sets out:

1. Who we are
2. How we handle data for Parents and Students
3. How we handle job applicant data
4. How we handle Staff data
5. How we handle online data
6. General Principles

Personal data is defined as information that can be used to identify an individual. This includes information such as a name, address, phone number, email address, IP address, or cookie identifier.

1. Who we are

For the purpose of the General Data Protection Regulations (the “Regulations”), the data controller is Kingfisher Education, a Company registered, at Unit 7, Churchill Court, 33 Palmerston Road, Bournemouth, BH1 4NH under Company number - 14579470

Our registration number with the Information Commissioner’s Office is 66115227, registered under Exsportise Limited.

We will refer to Exsportise Limited as (‘Company’, “us”, “we”, or “our”) which operates <http://www.kingfishercamps.com>, the “Site”.

The individuals who use our Sites, including students, parents, business or personal contacts that we engage with as customers or suppliers, are collectively referred to as "you" or "your." This Policy outlines the handling of any personal data that you provide or that we collect from you during our standard business activities, marketing efforts, or while accessing our Sites.

We use your personal information solely to respond to enquiries, deliver our courses, and maintain communication through targeted emails and marketing materials. We recognise that by visiting our website, you consent to the collection and use of your information as outlined in this Policy.

EU Representative:

Pursuant to Art 27 of Regulation (EU) 2016/679 (General Data Protection Regulation - "the GDPR"), Gallery Teachers, a division of Roxinford Education Group Ltd, is hereby appointed as EU Representative to Kingfisher Education. For further information about the Representative please refer to "Transfers of Data in Europe & EU Representative".

2. How we handle Students and Parents data

This policy explains how we collect your personal information, why we need it and what we do with it.

The 'personal information' that we may collect on you.

This may include but is not limited to:

- Your contact details, including full name, mobile phone number, address and email address
- Your parents'/emergency contact details
- Your flight details and/or travel details
- Your passport details
- Your level of English
- Any health or dietary information
- Your attendance records
- Welfare concerns including behaviour
- Photographs/videos which contain your image limited to be able to identify you

Where do we get this personal data from:

We need to collect personal data of students and their parents to ensure the successful delivery of our courses and to safeguard your well-being. Please complete the booking form in full so that we can process your course application. We may also obtain further personal data from relevant agencies and third parties where relevant.

Use of photos and/or videos

We take a limited amount of photos and/or videos of our students enjoying the courses. We may from time to time share these images through our social media platforms and blogs to allow those who are involved in the course (including parents, students and representatives) to see the activities that our students are taking part in.

We ensure that if we have course blogs that these are password-protected so that only those directly involved with the course (parents, staff, students, representatives) can access and view them. We also make sure that the student's full name will not be displayed or tagged within the image.

Photos/videos may also be taken and used/shared as follows:

- Group course/class photos (so students return home with a photo of them with the other course attendees)

The places that we may use these images are:

- Blog posts
- On our website, brochure and other marketing materials
- Social media posts
- Used by official representatives overseas for their website/brochure
- Other professional organisations, such as the British Council and other affiliated bodies

We may use these images in future years for the above purposes.

If you do not wish a student's image to be used for marketing purposes, please contact admin@kingfishereducation.com. Students should contact their Group Leader or Kingfisher Education staff member to withdraw consent or if they do not wish their image/s to be used in another context. In accordance with our safeguarding policy, we will not permit photographs, videos or other images of young people to be taken without the consent of the parents/carers and the child.

The People we may need to share your information may include:

- Our insurance provider (if you are eligible for cover under our medical and travel insurance policy)
- Our legal advisors for the establishment, exercise or defence of legal claims.
- Examination boards, if you take one of their exams

- Other professional organisations and affiliated bodies, such as The British Council and The British Activity Providers Association, which inspect our courses to ensure we meet agreed quality standards.

CCTV

All our buildings which host our courses have CCTV cameras in several locations around the school/campus to ensure the safety of the students. **These centres adhere to the ICO's code of practice for the use of CCTV.**

Lawful Basis of Processing

We process personal data of students that access our courses under contract. The processing of this personal data is necessary for the contract or we have been asked to take specific steps before entering into a contract.

- Legitimate interest: We might also handle personal data to serve the legitimate interests of the Company. We can process your personal information as long as these interests do not infringe upon your rights or freedoms. We have carefully considered the Company's legitimate interests against individual rights and determined that this balance is reasonable. At all times, the data subject retains the right to be forgotten and to have their personal information erased.
- Special categories of personal data: we also comply with an additional condition where we processes special categories of personal information such as health information and passport details, by seeking your consent to store and process this data.
- Public interest in: we also have a public interest in providing students with a course, ensuring that we are complying with safeguarding guidelines and promoting the welfare of all our students and ensuring the proper operation of our programme.
- Legal obligations: if we have a concern about the welfare of a student we may need to disclose this as well as your personal details to a local authority or police in appropriate situations.
- Vital interests: we will protect your vital interests in certain situations where for example you are seriously hurt or unconscious and cannot give consent.

Holding your personal information

We will collect your personal information to fulfil

our duties and responsibilities. We will retain this information indefinitely, for example, to investigate any complaints or to provide you with attendance confirmations, unless you inform us that you prefer we do not keep it.

The Right to deletion and correction

We try to ensure we have the correct Personal Information on you. You may ask for:

- Confirmation of what personal data is held on you, a copy of the data and who it has been shared with.
- For your details to be amended if they are incorrect.
- Your details to be deleted.
- To stop receiving emails by using the unsubscribe links

Further guidance

To withdraw your consent and/or ask for amendment to your personal data please email:

admin@kingfishereducation.com

If you have any questions, please talk to the Director or email:

admin@kingfishereducation.com

3. Information for job applicants on personal data

We have set guidance on the personal data that we collect for job applicants, how we use it and the rights that you have.

Legitimate Interest

We must collect personal data on all applicants, regardless of whether they are ultimately successful or not, to assist in managing our business. We have carefully balanced the legitimate interest of the Company against the rights of individuals and find this to be reasonable. Importantly, as the data subject, you have the right to be forgotten and can request the deletion of your personal information at any time.

In connection with your job application, we collect, store and make use of the following personal information and “special categories” of more sensitive personal data about you:

Personal Information

Information you have provided us on your CV and application:

- Name (incl. preferred name)
- Nationality
- Contact details
- Date of birth
- Employment history
- Qualifications
- Emergency contact details
- Driving details, incl. endorsements (if willing to drive)
- Information you have provided us during an informal phone call / formal interview
- Information your referees have provided us with
- Information you provide us to carry out a DBS application and, if required, foreign police check as well as prohibited list check

Special Categories

- Information about your preferred pronouns
- Information about your health, including medical conditions and dietary needs
- Information about criminal convictions or offences

From which sources your personal information is collected:

- You, the applicant
- A recruitment agency
- Your names referees (for performance and disciplinary information and confirmation you are suitable to work with children)
- Disclosure and Barring Service (for criminal convictions)

How we use and share your information:

- To assess your suitability for the role taking into account skill and qualifications
- To carry out reference and background checks
- To communicate with you about the recruitment process
- To keep records in relation to our hiring processes
- To conform with legal and regulatory requirements

We may handle personal data to serve the legitimate interests of the Company, as appointing someone to the role would be beneficial. Additionally, we need to evaluate your personal information to determine that you meet the minimum qualifications for the position and if your application is strong enough to warrant an invitation for an interview. Should we choose to extend an offer for the role, we will need to verify your references, conduct a criminal background check, and perform several other safeguarding checks in accordance with our recruitment policy.

If you fail to provide personal information:

If, when requested, you fail to provide us with personal information we require to assess your suitability for the role, we will not be able to take your application any further. For example, if you fail to provide us with your referees, evidence of qualifications or work history, we will not be able to process your application successfully.

Information about Criminal Convictions

Candidates who receive a job offer will receive this on the condition that they successfully complete several pre-employment checks. These include obtaining satisfactory references, verifying their identity and right to work in the UK, providing proof of relevant qualifications, and passing a criminal record check. We are legally obligated to confirm that there is nothing in your criminal history that would pose an actual or potential risk to children or young people, which would render you unsuitable for the position.

Any role working with children or young people is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended by the Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) Order 1986 and is therefore eligible for an enhanced check from the Disclosure and Barring Service.

Data Security

Access to your personal information is limited to those employees, agents and other third parties on a need-to-know basis. They will only process your information on our instructions and are bound to confidentiality.

Use of photos

We may take head shots of job applicants during the interview process. In some cases applicants also submit a photo with their application.

The photos may be used for the following purposes

- The production of staff ID badges
- The production of staff hierarchy and “who to contact” posters and notices

How long we will use your information for:

We will retain your information for a period of 12 months after the role has been filled so that we can show, in the event of a legal claim that we have not discriminated against applicants.

Furthermore, we also keep your information to consider you for any future vacancies should they come up. Given the nature of our industry, working for us appeals to many students and professionals who are in search for seasonal work each year and are, therefore, relatively likely to be interested in a future position with us.

By completing our application form, and as mentioned on the form, you consent to your information being held by us for 12 months. After this time, we will securely destroy your personal information in accordance with our Data retention policy.

The Right to deletion and correction

We try to ensure we have the correct Personal Information on you.

You may ask for:

- Confirmation of what personal data is held on you, a copy of the data and who it has been shared with.
- Detail amendments should they be incorrect.
- Your details to be deleted.

To make one of the above mentioned requests, please email:

admin@kingfishereducation.com

4. Information for Staff on personal data

We have provided guidelines on the personal data we collect on staff, how we use it and the rights that you have. If you have any questions, please reach out to your manager. Staff include employed and contracted personnel. We also have a Data Protection Policy which offers more details.

We need to collect personal data on staff during the recruitment process for employment purposes, to help us manage our business.

We will also collect the following personal data on you once you have been appointed.

- Health and/or dietary information
- Uniform clothes size
- National insurance number
- Bank details
- Attendance records
- Photographs/videos which contain your image

How we use and share your information

- We may need to send limited personal data on yourself including your contact details, date of birth and national insurance number to payroll and/or accountants department.
- To provide our host centres details on your name and criminal check details, relevant allergies, health concerns and allow the host schools to monitor your use of the internet while you are on site.
- Your personal data, qualifications, employment history and criminal check details with relevant inspection bodies, such as The British Council and The British Activity Providers Association.

Use of photos and/or videos

We take a limited amount of photos and videos of our staff during the courses. Occasionally, we may share these images on our social media and blogs to give parents, students, and representatives involved in the course a glimpse of the activities taking place.

If we have blogs from the course, these are password-protected so that only those directly involved with the course (parents, staff, students, representatives) will be able to view them.

We ensure that full names will not be displayed with the image.

Photos/videos may also be taken and used with group course/class photos (for students to return home with a photo of them with the other students and staff).

We may use these images in:

- Blog posts
- On our website, brochure and other marketing materials
- Social media posts
- Used by official representatives overseas for their website/brochure
- Other professional organisations, such as the British Council and other affiliated bodies

We may use these images in future years for the above purposes.

If you do not wish your image to be used for marketing purposes, please contact your manager or

email: admin@kingfishereducation.com

CCTV

All our buildings which host our courses have CCTV cameras in several locations around the school/campus to ensure the safety of the students. **These centres adhere to the ICO's code of practice for the use of CCTV.**

Lawful Basis of Processing

We will generally process personal data regarding staff as we are under contract. The processing of such personal data is necessary for the contract or we have been asked to take specific steps before entering into a contract.

- Legitimate interest: We might also handle personal data to serve the legitimate interests of the Company. We can process your personal information as long as these interests do not infringe upon your rights or freedoms. We have carefully considered the Company's legitimate interests against individual rights and determined that this balance is reasonable. At all times, the data subject retains the right to be forgotten and to have their personal information erased.
- Special categories of personal data: we comply with an additional condition where we processes special categories of personal information such as health information and passport details, by seeking your consent to store and process this data.
- Employees/Contractors: we will keep relevant employee and contractor personal data while you are employed and for up to 6 years after you leave to comply with HMRC requirements (legal obligations) and to ensure we have records to allow us to deal with any contractual issues.

How long we will use your information for:

We are committed to protecting the privacy and confidentiality of employee information. HR records are retained for the duration necessary to fulfil their purpose, in compliance with legal and regulatory requirements. The statutory retention period for documents varies depending on the type of record. Basic personnel files, including appraisals and employment contracts are retained for six years after the end of employment. For a full breakdown of HR record retention, please refer to our Data Retention Policy.

After the retention period, records will be securely disposed of to protect employee privacy.

The Right to deletion and correction

We try to ensure we have the correct Personal Information on you.

You may ask for:

- Confirmation of what personal data is held on you, a copy of the data and who it has been shared with

- For your details to be amended if they are incorrect
- Your details to be deleted.
- To stop receiving emails by using the unsubscribe links

To make one of the above mentioned requests, please email:

admin@kingfishereducation.com

5. Online Information

This section explains how we use personal data collected from our website visitors. We collect information from you when you:

- Use our website as traffic data
- Complete our on-line contact form by means of ‘cookies’
- Request a brochure and/or show an interest in our services;
- Fill out an application form online

While using our site with the view to be accessing one of our courses, we may ask you to provide us with certain personal data information that can be used to contact and/or identify you. We need this information in order to reply to your enquiries, provide you with our course information, invoice you, collect payment and keep in touch with you from time to time with newsletters and targeted marketing emails. Personally, identifiable information may include, but is not limited to your name.

As part of this process we may collect the following Personal Information about you:

- Your title, name, address, email address, telephone numbers, payment details, details on your child, emergency contact information and such other contact details as we require. This includes information provided at the time of accessing our Sites or otherwise entering into discussions with us regarding our services, as well as targeted marketing purposes ‘our Company’.
- Not all of this data will be personal data.
- If you contact us, we may keep a record of that correspondence.

Initial online contact

We collect information that you provide when you register or interact with our site, including requests for us to reach out to you. We only require essential information necessary to offer you our services, such as your name, address, phone number, and email address. If we need any additional information to enhance our services beyond the basic requirements, we will clearly indicate that your response is voluntary, and you are welcome to decline providing further details if you choose not to.

Log Data

Like many other site operators, we collect information that your browser sends whenever you visit our site (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Sites that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyse this.

Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer’s hard drive. Like many sites, we may use “cookies” to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Sites.

Security of your personal data

We take all reasonable precautions to prevent the loss or misuse of your personal data. We store personal data on secure systems.

If you no longer wish to receive our emails, then please unsubscribe or email:

admin@kingfishereducation.com

6. General Principles How we use your information

We use your information to provide you with our courses. As part of this we may also contact you for market research purposes, targeted marketing (including newsletters and promotional material) with regards to our business and to help improve on our customer service.

We will also use your information in the following ways:

- To ensure that content from the Sites are presented in the most effective manner for you and for your computer.
- To provide you with information regarding our courses.
- To deal with our suppliers.
- To provide you with billing information in relation to our courses.
- To manage the Site, detect fraud or Site abuses, send you information relevant to the Site and in case we have any queries.
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you of any changes to our business.
- To provide you with information about services we offer.
- We also need to use your contact details and other information for any aspect of the Sites (including, without limitation, providing customer support, preventing or investigating prohibited activity, enforcing our terms and conditions, and verifying information).

When we share your information

We may share your information with relevant third parties under specific conditions, but we will never sell, rent, or trade your Personal Information. Your details may be shared with another organisation that purchases our Company or its assets, or with an organisation from which we acquire a business. This could occur during any prior negotiations with that organisation, regardless of whether these negotiations result in a sale.

We may share your information with our funders or potential funders, such as our bank and with our professional advisors who have a reasonable need to see it.

We may share your information with any group companies of ours so that they can provide you with information about our products and services available from them.

Other than as set out in this Policy, we shall NOT sell, share or disclose your personal data to third parties without first obtaining your consent unless this is necessary for the purposes set out in this Privacy Policy or unless we are required to do so by law.

Where we store your personal data

- All information you provide to us is stored on our secure servers. We use industry standard security and firewalls on our servers.
- We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- Only authorised personnel and contractors have access to your information.
- We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage.

Transfers of Data in Europe & EU Representative

Now that the UK has left the EU, we are required as per Article 27 of Regulation (EU) 2016/679 (General Data Protection Regulation - "the GDPR") to appoint an EU Representative as a point of contact for EU citizens to get in touch with us about their data.

Gallery Teachers, a division of Roxinford Education Group Ltd, is hereby appointed as EU Representative to Exsportise Limited. Gallery Teachers has offices in the UK, Italy and Spain.

The following tasks are the responsibility of the Representative:

- Help Kingfisher Education provide individuals with access to their data subject rights
- Act as the main point of contact for Supervisory Authorities
- Alert Kingfisher Education to any correspondence received from Supervisory Authorities
- Alert Kingfisher Education to any inquiries received from data subjects
- Be readily available to carry out the above mentioned work

All notices, demands, or requests should be sent to: dpo@galleryteachers.com

Other websites

Our site may, from time to time, contain links to and from the websites of our partner schools, networks and affiliates. If you follow a link to any of those websites, please note that those websites

have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites.

Consent

- By submitting data to us and using the Sites, you consent to our use of your data and of anyone you represent in the manner set out in this Policy (as amended from time to time, as described below) and you are responsible for ensuring that you have authority to consent on behalf of anyone about whom you submit data to us.
- You can revoke any consent you have given us under this Policy at any time by contacting us at admin@kingfishereducation.com and referencing this Policy in the email subject line, using the body of the email to say what consent you are revoking.

Changes to This Policy

We reserve the right to update or change this Policy at any time and you should check this Policy periodically. Your ongoing use of our services following any updates to this Policy will signify your acknowledgment of the changes and your agreement to adhere to the revised Policy.

If we make any material changes to this Policy, we will notify you either through the email address you have provided us, or by placing a noticeable notice on our site.

Contact Us

If you have any questions about this Policy, please contact us.

If you have any queries about the information we hold on you, please email admin@kingfishereducation.com.

You can also complain to the Information Commissioner's Office <https://ico.org.uk/concerns/> or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF