



## Privacy notice

### Introduction

At Knightsbridge Schools International (KSI) we understand that confidentiality and security of the personal information (Personal Information) that you share with us is important. That is why we have developed specific policies and practices designed to protect the privacy of your Personal Information. By sending us your CV, you have consented to the collection and use of your Personal Information in accordance with this privacy notice ("Privacy Notice" or "Notice"). Therefore, we encourage you to read this Privacy notice carefully and contact us with any questions or concerns you might have.

### What is Personal Information?

Personal information is the information that identifies you, such as your name, address, email, photo or postal address. Your Personal Information is controlled by Knightsbridge Schools International Ltd, an organisation registered in the United Kingdom and whose registered office is located at Unit 47, 124-128 Barlby Rd, London W10 6BL, United Kingdom.

### Who we are?

Knightsbridge Schools International (KSI) is the data controller for the information that we collect when you submit your CV to us and/or visit our website. The company is registered in Malta Reg. No. C46969, 171 Old Bakery Street, Valetta, VLT 1455 Malta.

The National Data Protection Authority is:  
The Information Commissioner's Office  
Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
Tel. +44 1625 545 745  
e-mail: [international.team@ico.org.uk](mailto:international.team@ico.org.uk)  
Website: <https://ico.org.uk>

### What Personal Information do we collect?

#### *Information you give us*

- You may give us Personal Information about you, in a number of ways; these include:
  - using, visiting or interacting with our website (such as filling out forms or registering on our website);
  - visiting our offices or schools;
  - during an interview or meeting;
  - corresponding with us by phone, e-mail or post; and
  - sending information directly to us, or providing information as requested by us and/or which is necessary from time to time (for example providing your job application form, CV or business card).
- The information you give us may include the following information about you:
  - full name;
  - photograph;
  - marital status;
  - National Insurance number;
  - salary;
  - employment history;
  - contact details (including home address, e-mail address, and mobile, home and/or work phone number);
  - financial information (for example payee details);
  - passport details, nationality and other information relating to immigration status;
  - previous educational records and achievements;
  - information received via safeguarding forms when visiting a site;
  - information about your physical or mental health, or disability status, to ensure your health and safety at our sites and to assess your fitness to work and to provide appropriate adjustments;



- information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and
- references (as an applicant or potential supplier).

*Technical information we collect about you when you visit our website*

With regard to each of your visits to our website we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.
- Our website may contain links to and from the websites of our partner networks, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this notice and may have their own privacy notices. We do not accept any responsibility or liability for these notices. Please check these third party notices before you submit any Personal Information to these websites.

*Information we receive from other sources*

- We may be working closely with third parties (including, for example, recruitment agents, previous employers, medical practitioners, education authorities, business partners, and payment and delivery services) and may receive information about you from them.
- We may also use CCTV footage to ensure our sites are safe. We may receive information about you if you use any of the other websites we operate or the other services we provide.

**How do we use personal information?**

Your Personal Information will only be processed where we have a specific purpose, and a lawful basis, for doing so. These purposes and bases are listed below.

*Information you give to us*

- We will use the information you give to us to pursue the following legitimate interests (as applicable to our relationship with you):
  - to promote the objects and interest of our schools, ensure the most efficient management of the schools and ensure that the schools' legal obligations are adhered to;
  - to store this information on our management information system/s;
  - to enforce our terms of use with you or any other contract we may have with you;
  - for the purposes of recruitment;
  - to enable us to receive your services; and
- We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us or receive the services we request from you. For example, we may be recruiting you for a role at KSI, or engaging you to supply us with services and will use Personal Information where necessary to recruit you or receive your services.
- In addition, we may be required by law to do the following (which is not an exhaustive list):
  - keep an accounting record of payment; and
  - keep a record to evidence fair recruitment processes.

*Information we collect about you from our website*

- We will use this information for the following legitimate interests:



- to contact you if you have made an enquiry to one of our schools via our online enquiry form and/or to inform you about available places in the future;
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;
- as part of our efforts to keep our website safe and secure.

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

- We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a reference from a previous employer relating to you, which may impact a recruitment decision.

#### **What are the legal basis for processing your Personal Information?**

Your Personal Information will be collected, processed and stored for the purpose of the employment of staff or the execution of contracts and agreements with KSI.

We do so under the lawful basis that the processing is necessary for the performance of a contract in which you as the data subject is entering or has entered into (Art. 6 (1) a) GDPR). In some circumstances we may have to process data for other purposes that are not necessary for the performance of the contract but are within the lawful basis of Art. 6 (1) b)-f) of the GDPR. In such cases, the processing may be based upon

- our legitimate interests, such as providing a safe learning environment, maintaining the KSI community, fundraising, etc.,
- on the compliance with our legal obligations

#### **When do we share Personal Information?**

Occasionally, KSI will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, police or the local authority); and
- appropriate regulatory bodies (e.g. HMIE, OSCR or the Information Commissioner).

For the most part, Personal Information collected by KSI will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records; and
- pastoral or safeguarding files.

Some of the school's processing activity is carried out on its behalf by third parties, such as IT and communications systems, or cloud storage providers. This is always subject to contractual assurances that the third party is compliant with current Data Protection Legislation (GDPR) and that Personal Information will be kept securely and only in accordance with the school's specific directions governed by a Data Sharing Agreement where necessary.

#### **Where do we store and process Personal Information?**

We keep Personal Information for as long as necessary with regard to the purposes described above or for any other purposes that may be communicated to you.

In general, your Personal Information are stored on our own servers and on the servers of our external providers, located in the European Union.

Personal Information may also be transferred to organisations outside the United Kingdom and outside the European Union. This may for example occur for the purposes of student application for



college or university. Various teaching and learning applications of providers that are based outside the European Union are also used.

For such transfers of Personal Information outside the European Union, KSI has implemented suitable safeguards in the form of standard contractual clauses where required under applicable data protection legislation. Where this is not the case the data is anonymized before transmission. More information on these transfers and suitable safeguards can be requested from the data protection officer.

### **How do we secure Personal Information?**

KSI has developed its internal organisation in such a way that it complies with the specific requirements regarding data protection. For the time that KSI stores and uses Personal Information, KSI will ensure the appropriate security of this Personal Information including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Our website is hosted on internal servers, the technology is provided by Drupal. Data collected via our website is secured via a SSL encrypted connection.

Please note that communication and data processing via e-mail might not be 100% restricted from illegal access.

### **How long do we keep your Personal Information for?**

KSI will retain Personal Information securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and student personnel files is up to 7 years following departure from the school. However, incident reports and safeguarding files may need to be kept longer, in accordance with specific legal requirements.

If you have any queries about how our retention policy is applied, or wish to request that Personal Information that you no longer believe to be relevant is considered for erasure, please contact us at [ictadmin@knightsbridgeschools.com](mailto:ictadmin@knightsbridgeschools.com). Please bear in mind that KSI will often have lawful and necessary reasons to hold on to some Personal Information even following such request.

A limited and reasonable amount of information will be kept, for example for historical or archiving purposes.

### **Personal Data Retention Schedule**

Data	Retention Period
Applicant Data - Name, Role applied for, source, outcome	6 full calendar years after application, ending 31 December
Applicant Data – CV, interview notes, psychometric and other assessment materials	If not appointed: up to 2 calendar years ending 31 December If appointed: for the duration of appointment plus 6 full calendar years after the end of employment ending 31 December
Employment Data	During employment and thereafter for 6 full calendar years ending 31 December
Employment Data after leaving: Name, last known address, contact details, last salary and benefits, start date, end date, NI Number, Date of Birth, Gender, Re-employment indicator	Indefinitely – so that we can provide employment references for you in future.



### **Your rights in relation to Personal Information**

Data Subjects have a number of rights relating to how their Personal Information is used. Please be aware that certain exceptions apply to the exercise of these rights and so you will not be able to exercise them in all situations. In addition, these will vary slightly between EU member states. If you wish to exercise any of these rights we will check your entitlement and respond within a reasonable timescale.

Where applicable under the GDPR. You will have the following rights relating to your Personal Information:

- **Right to request access** to your personal information.
- **Right to request correction** of the personal information that we hold about you.
- **Right to request deletion** of your personal information.
- **Right to object to processing** of your personal information.
- **Right to request the restriction of processing** of your personal information.
- **Right to have a copy** of any Personal Information you have provided to us returned to you, or **transferred** to another controller.
- **Right to complain** to your local Data Protection Authority about our processing of your Personal Information.

If you have any queries relating to your rights or exercise of your rights, please contact us.

### **How to contact us?**

We welcome your views about our website and our Privacy Notice. If you have any questions or concerns about this Notice and/or your Personal Information, or if you wish to file a complaint, please contact our Head Office at [ictadmin@knightsbridgeschools.com](mailto:ictadmin@knightsbridgeschools.com)

### **Use of cookies and other technologies**

Cookies are small pieces of information sent from our website to your computer or mobile device and that are stored on your device's hard drive. Cookies allow us to gather useful information such as the number of visitors to our site, which pages they have been visiting and other technical information that allows us to improve our services.

KSI uses cookies to track our online traffic flow, to provide a better user experience for social and multi-media and to personalise information in online forms. As a website user, you can set your web browser to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. Please note that the information supplied by cookies helps KSI to provide you with a better user experience and that by not accepting cookies, this may affect your ability to access certain parts of our website. Information on the cookies used on the KSI website can be found [here](#).

### **Linking to other websites / third party content**

This website may contain links to third-party websites. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every Web site that collects personally identifiable information. This privacy statement applies solely to information collected by this website.