



Bloxham School & its Subsidiaries - Spiralhome Ltd

Privacy Policy

Introduction

Welcome to Spiralhome Ltd's Privacy Policy. Spiralhome Ltd is the commercial subsidiary of Bloxham School. This privacy policy will provide information on how Spiralhome Ltd protects, manages, stores and deletes personal data. It will also provide information on individual privacy rights and how the data protection law protects an individual's personal data. Furthermore, it will outline what Spiralhome Ltd will do with individual data and who it will share this information with.

It is important that individuals read the privacy notice from time to time so that they can remain fully informed on how and why Spiralhome Ltd is using individual data.

Spiralhome Ltd may also retain information of persons under the care of an individual or organisation when Spiralhome Ltd has a legitimate need to do so – such as children for the purposes of swimming lessons, coaching and activity groups.

How to Contact Spiralhome Ltd

- Spiralhome Ltd, Bloxham School, Banbury Road, Bloxham, Banbury, OXON, OX15 4PE
- 01295 724367 (Bursary)
- Bursar@bloxhamschool.com
- www.bloxhamschool.com

What is Personal Data?

Personal information is information that identifies you as an individual and relates to you. This includes your contact details, your relationship with the School and financial information.

General

Spiralhome Ltd collects personal data which is necessary for it to carry out its services that individuals request and for hire of its facilities. This includes information required for course/lesson administration and delivery, memberships to the sports and leisure facilities or services, hiring agreements or simply managing a relationship between an individual and Spiralhome Ltd.

As a data controller, Spiralhome Ltd will make its privacy policy available online and provide the privacy notice upon request from an individual, at the point at which Spiralhome Ltd requests to collect data.

Spiralhome Ltd has not appointed a data protection officer as it is not required to do so, but has however, adopted the approach that each head of department will be the responsible lead for data protection within their area of



work. The Bursar will have overall responsibility for data protection compliance and oversee the heads of department and provide further support and guidance where required. Any questions regarding the privacy policy or requests to exercise individual rights can be sent to Spiralhome Ltd.

Personal information Spiralhome Ltd collects

Spiralhome Ltd collects personal data in a number of ways:

- Through membership application.
- Through enrolment into lessons/courses
- Through email, telephone or website enquiries.
- When purchasing a product
- When hiring a facility
- When completing a survey
- When feedback is sent to Spiralhome Ltd.

Spiralhome Ltd collects the following types of information:

1. Personal contact – to allow direct communication between Spiralhome Ltd and an individual, for example for Spiralhome Ltd to service an individual's membership or agree hire of a facility.
 - Address.
 - Email address.
 - Name.
 - Telephone number.
 - Title.
 - Date of birth
 - Photographs. This may include member identification, or inclusion in an advert/promotion. Spiralhome Ltd will initially approach an individual for their consent to be included in an advert/promotion.
2. Personal contact details may also be requested when collecting information regarding an individual's health and ability levels, for example swimming lessons, first aid courses or gym inductions. This may include:
 - Medical conditions
 - Disabilities/impairments
 - Behavioural requirements
 - Special learning requirements
 - Physical activity readiness
3. Personal data we may process about persons under your care, such as children engaging in swimming lessons at your request:
 - Name(s)
 - Gender
 - Date of birth
 - Height
 - Details of any medical conditions that may be relevant to a child's/children's safety, when in receipt of our services



Where we collect gender, biometric or medical data about an individual or child/children under their care, we do so on the basis that we require this data to safely and efficiently provide our services: for example, to ensure a child is tall enough to stand in our pool; to allow our teachers to appropriately communicate with a child; or to ensure the appropriate changing facilities are available.

4. Organisation details – to apply membership discounts based on employer partnership contracts and additional contact members.
 - Employer.
 - Workplace.
5. Interactions with Spiralhome Ltd – to facilitate interactions and requests between individuals and Spiralhome Ltd.
 - Email communications.
 - Telephone conversations.
 - Written correspondence.
6. Financial details – to enable Spiralhome Ltd to receive, make payment and record transactions between individuals or organisations and Spiralhome Ltd.
 - Bank details.
 - Batch payment details - bank info included.
 - Cheque/payment details.
 - Credit/debit card details.
 - Delivery notes.
 - Direct Debit Mandates.
 - Member/partner fees.
 - Membership/partnership payment charge.
 - Order details.
 - Purchase invoice.
 - Sales invoices and credits.
7. Use of Spiralhome Ltd services – to enable and record the use of and movement through online systems for (current and future systems).
 - Passwords.
 - IP addresses.
 - User names.
 - Record of attendance at lessons, courses, court hire, visits to the gym etc.
8. Identification and Spiralhome Ltd support – how Spiralhome Ltd identifies an individual, captures information to ensure eligibility into membership and services additional support as part of the membership benefits (for example, recording disabilities to ensure needs are met at courses and lessons).
 - Career history (CV)
 - CPD



- o Date of birth.
- o Disability.
- o Ethnic origin.
- o Gender.
- o Qualifications.

9. Spiralhome Ltd administration – data that Spiralhome Ltd records to fulfil its business functions.

- o Contracts.
- o Mailing preferences.
- o Lesson/course or member/partner category.
- o Lesson/course or membership/partnership number.
- o Lesson/course or membership/partnership renewal date.
- o Lesson/course or membership/partnership start date.
- o Lesson/course or membership/partnership status.
- o Type of lesson/course or membership/partnership

Personal details about ethnic origin, disability etc. are considered 'sensitive' personal data and are applicable under data protection laws. Spiralhome Ltd processes this data only if the individual has given Spiralhome Ltd explicit consent, or it is necessary (for instance if you request special assistance), or you have deliberately made it public.

Why Spiralhome Ltd collects personal data

Spiralhome Ltd will only collate and use personal data where the law permits. Spiralhome Ltd processes personal information to enable it to provide a service for the benefit of the enrolled candidates, members, hirers or any other individuals as specified in Spiralhome Ltd's services.

Lawful data collection

Spiralhome Ltd most commonly uses personal data in the following circumstances:

- o Consent – to obtain genuine consent from an individual in relation to their personal data.
- o Contract – to perform the contract that the individual or organisation is about to enter into or has entered into.
- o Legal obligation – where Spiralhome Ltd has legal or regulatory purposes, such as its duty of care and HMRC requirements.
- o Legitimate interests - where it is necessary for Spiralhome Ltd's legitimate interests, and an individual's interests or fundamental rights do not override Spiralhome Ltd's interests.
- o Identifying medical conditions or needs specific to an individual – for example medical conditions that may affect an individual engaging in physical activity or learning requirements that may need to be supported during courses.



Our legal bases for using your information

1. Legitimate interests

This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for purposes agreed when providing a service or facility. Specifically, we have a legitimate interest in:

- Safeguarding and promoting the welfare of all visitors and staff
- Contacting hirers, members or users of the facilities and services
- Ensuring that there is an active community of supporters which will benefit the School and members of the School community;
- Using your personal information to administer our events;
- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings;
- Ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above please contact us via the details found within 'about Spiralhome Ltd'.

2. Consent

In some cases, we are processing your personal information because you have given us your consent to do so. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact the bursary.

3. Necessary for a contract

We will need to use your information in order to perform our obligations under a contract with you, for example, we need your name and contact details so that we can send you course certificates or arrange hire of a facility.

4. Legal obligation

On some occasions we will need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.

5. Vital interests

For example, to prevent someone from being seriously harmed or killed.



Marketing preferences

Spiralhome Ltd communicates with individuals who have requested to receive special notices, updates or information based on lesson/course/facility availability and benefits. Marketing for Spiralhome Ltd is typically channeled through its 'leisure' sector. Individuals can change their preferences by emailing leisure@bloxhamschool.com or bursar@bloxhamschool.com at any point in time. Marketing preferences do not include communications specifically relating to or regarding the management of contracts, membership, course/lesson enrolment or partnerships with Spiralhome Ltd.

Cookies

Spiralhome Ltd uses data analytics on both Bloxham School's and Spiralhome Ltd's website to improve the function, products, services, marketing, customer relationship and experiences to ensure that the website remains up to date and relevant to the needs of its users. Further information can be found in Bloxham School's privacy policy, available at www.bloxhamschool.com.

Data retention

Spiralhome Ltd keeps personal data only for as long as is necessary and in accordance with its legal obligations and legitimate uses. We will retain your information for as long as needed in order to provide the relevant services to you or perform any contract we have with you, and to deal with any queries, provide you a continuous service (such as if you start lessons/courses with another child), or to refer back to your history should you leave and re-join (such as swimming ability).

If you consent to photographs, we may request your permission to use a photograph for:

- Website, local social media or local newsletters;
- Broader promotional or marketing purposes.

Should you consent to any of these, personal data will be kept alongside the photograph to enable us to contact you, or to enable you to withdraw consent. Should you wish to withdraw consent or have your photographs deleted sooner than the retention period as referred to above, please contact us.

If you give us permission to use a photograph for promotional or marketing purposes, we will retain a copy of that photograph for the length of time Spiralhome Ltd owns the copyright relating to that image in order that we can properly exercise our rights under copyright law.

Photographs taken at a photo shoot may be used for training and quality assurance purposes and we may share them within our group and franchise businesses for those purposes. If we retain photos for these reasons, they will not be used for any other purpose without your explicit consent.



Opting in

Individuals or organisations who have engaged in membership, contracts, partnership, course/lesson enrolment and hiring agreements, or requested communication from Spiralhome Ltd will have their data used and held by Spiralhome Ltd in accordance with its privacy policy, data protection and Bloxham School's IT security policies and procedures.

Opting out

Individuals or organisations who have opted-out of communications from Spiralhome Ltd will have their preferences changed and will no longer receive communication. Individuals' or organisations' data may be retained as per HMRC requirements. We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future. Wherever possible, Spiralhome Ltd will pseudonymise individual records by deleting personal data and retaining membership numbers, for example. This will allow Spiralhome Ltd to manage risk and maintain business continuity.

Right to erasure

Individuals who request to delete their data will have this deleted in accordance with HMRC requirements or within one month of the request if applicable. Data which cannot be deleted immediately will be held for Spiralhome's legal, regulatory or business purposes which are governed by other legal or regulatory bodies, for example the HMRC.

Data security

Spiralhome Ltd and Bloxham School are committed to preserving the confidentiality, integrity and availability of all the physical and electronic information assets throughout its operations. Spiralhome Ltd and Bloxham School have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In accordance with its data protection and IT security policy and procedures, Spiralhome Ltd and Bloxham School limits access to personal data to employees, volunteers, contractors and disclosed third parties who have a business function to complete. The personnel and organisations will only process personal data on Spiralhome Ltd's instructions (for example, instructors whilst leading courses or lessons) and are subject to a duty of confidentiality.

Spiralhome Ltd and Bloxham School has procedures in place to monitor, identify and manage any suspected breaches of personal data. If a breach has occurred, Spiralhome Ltd will notify the individuals involved, of this breach where it is legally required to do so.



Sharing personal information

Spiralhome Ltd may be required to share your information in the following ways:

- In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate/Ofsted and the Department for Education, for example, if we have safeguarding concerns.
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events.
- We use contractors to help us with our work (e.g. squash court hire) or where we store our database in the cloud. If memberships, facility hire, lessons or courses are administered using external database systems or websites, the providers of these database systems or websites do not receive consent from Spiralhome Ltd to use any personal data for its own purposes.

Spiralhome Ltd may share information with an employer for the purposes of instructing courses/lessons, or to external education providers only where the individual has approved the sharing of the information. In order to carry out its business, Spiralhome Ltd may (with the individuals' permission or requirements of law) also share personal data with emergency services, law enforcement and security services.

Individual legal rights

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.

Rights in relation to automated decision making and profiling

Individuals have the right to invoke any of the above at any point to Spiralhome Ltd and can do this by emailing leisure@bloxhamschool.com or bursar@bloxhamschool.com, or calling the Bursary via 01295 724367.



Privacy policy and notice

This privacy policy will be available on Bloxham School and Spiralhome Ltd's website so that individuals can continuously access this information. Spiralhome Ltd may also provide the privacy policy by other reasonable methods at the start of the relationship with an individual or organisation if requested by the individual or organisation. Where Spiralhome Ltd makes substantial changes or a new use for individual data is identified, it will provide individuals with an update version of the privacy notice before changes are made or new and associated documents are released.

It is therefore important that individuals inform Spiralhome Ltd of any changes to the personal data that it holds to ensure that Spiralhome Ltd can continue to communicate with the individual effectively.

If you are unsatisfied with our response to any data protection issues you raise with us, or you have the right to make a complaint to the Information Commissioner's Office (ICO). The ICO is the authority in the UK which is tasked with the protection of personal data and privacy.