



SUPPLIER PRIVACY POLICY

House Schools Group is a company registered in England and Wales and has as subsidiaries Bassett House school, Orchard House School and Prospect House School (collectively referred to as "HSG", "the group", "The Schools", "we" or "us" in this policy).

I OVERVIEW

1.1 Maintaining the security of your data is a priority at HSG and we are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. HSG is also dedicated to being transparent about what data we collect about you and how we use it.

1.2 This policy, which applies whether you visit our go on line to our group or schools' websites, provides you with information about:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

2 HOW WE USE YOUR DATA

2.1 General

2.1.1 HSG (and trusted partners acting on our behalf) uses your personal data:

- to pay you
- to verify your identity;
- for crime and fraud prevention, detection and related purposes;
- to enable HSG to manage necessary interactions with you; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

2.2 Sharing data with third parties

2.2.1 Our service providers and suppliers

2.2.1.1 In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include our bank (so that we can pay your invoices), it, and marketing service providers

2.2.1.2 HSG only allows its service providers to handle any personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to HSG and to you, and for no other purposes.

2.2.2 **Other third parties**

2.2.2.1 Aside from our service providers, HSG will never disclose your personal data to any third party, except as required by regulation or law. We will never sell or rent our customer data to other organisations for marketing purposes.

2.2.2.2 We may share your data with:

- credit reference agencies where necessary for card payments;
- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so;
- to comply with our legal obligations;
- to exercise our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of our employees and customers.

2.3 **International transfers**

2.3.1 To deliver products and services to you, it could be necessary for HSG to share your data outside of the European Economic Area. This will typically occur when service providers are located outside the EEA or if you are based outside the EEA. These transfers are subject to special rules under data protection laws.

2.3.2 If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure. Our standard practice is to use 'standard data protection clauses' which have been approved by the European commission for such transfers. Those clauses can be accessed [here](#).

2.4 **How long do we keep your data?**

2.4.1 We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data, however the longest we will normally hold any personal data on a supplier after we have ceased to use that supplier is 6 years, except that we may retain indefinitely the contact details of our main contact(s) within a supplier organisation so that if we have future need of the supplier's services, we know who to contact.

3 **HOW WE PROTECT YOUR DATA**

3.1 **Our controls**

3.1.1 HSG is committed to keeping your personal data safe and secure.

3.1.2 Our security measures include:

- encryption of data;
- regular cyber security assessments of all service providers who may handle your personal data;
- scenario planning and crisis management exercises to ensure we are ready to respond to cyber security attacks and data security incidents;
- occasional penetration testing of systems;
- security controls which heighten protective measures across the entire group to defend our IT infrastructure from external attack and unauthorised access;
- internal policies setting out our data security approach and training for employees; and
- reasonable physical and intruder alarm security measures.

3.2 What you can do to help protect your data

3.2.1 Except in special circumstances where the group's bursary will first have called you, we will never ask you without being forewarned by telephone to confirm any bank account or credit card details via email. If you receive an email claiming to be from HSG asking you to do so, please ignore it and do not respond.

3.2.2 If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

3.2.3 In addition, we recommend that you take the following security measures to enhance your online safety both in relation to HSG and more generally:

- keep your account passwords private. Remember, anybody who knows your password may access your account.
- when creating any password, use at least 8 characters. A combination of letters and numbers is best. Do not use dictionary words, your name, email address, or other personal data that can be easily obtained. We also recommend that you frequently change your password and avoid using the same password for multiple online accounts.

4 YOUR RIGHTS

4.1 You have the following rights:

- the right to ask what personal data that we hold about you at any time;
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge.

4.2 If you wish to exercise any of the above rights, please contact us using the contact details set out below.

5 COOKIES

5.1 Our websites use cookies to collect information. Please refer to our separate Cookie Policy.

6 THIRD PARTY SITES AND MICROSITES

Save for the necessity of making payments, in the case of suppliers HSG does not partner with third party sites.

7 CONTACT INFORMATION

7.1 If you have any questions about how HSG uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- phone us on: 020 8987 9893
- e-mail us at: dataprocessing@houseschools.com or
- write to us at: Data Compliance Officer, House Schools Group, 2 Rupert Road, London W4 1LX

7.2 You have the right to lodge a complaint with the information commissioner's office. Further information, including contact details, is available at <https://ico.org.uk/>