HURSTPIERPOINT COLLEGE

Summary Privacy Notice for parents and guardians of pupils at the College or applying to join the College

This notice explains how the College uses personal data about parents, guardians and carers (referred to as "parents") of current and prospective pupils at the Senior School, the Prep School and the Pre-Prep. It deals with two sources of data: that obtained directly from you and that obtained from others or elsewhere.

This privacy notice will be provided to you at the time your data is being obtained, or within one month where we obtain it from someone else.

1. Who we are

Hurstpierpoint College Ltd ("the College") is the data controller for your personal data. The College is a charitable company registered in England and Wales (charity number 1076498 and company number 3779893) with its registered office at College Lane, Hurstpierpoint, Hassocks, West Sussex BN6 9JS. It is registered with the Information Commissioner's Office under reference Z7510412.

The Bursar is the College's Data Compliance Officer and can be contacted at bursar@hppc.co.uk or by post at the address above.

2. What information we hold

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- information about your family circumstances where relevant to your child's education or welfare (for example parental responsibility or court orders);
- bank details, fee account and payment history, and financial information provided in support of a bursary application;
- correspondence with the College; and
- images captured at College events or by the College's CCTV system, and car details if you use College car parks.

3. Why we use it and our lawful bases

Data will be processed for the purposes of admitting your child, providing education and pastoral care under the Parent Contract, billing and collecting fees, meeting our safeguarding and other legal obligations, and keeping you informed about the College. The College's lawful bases are:

- **contract:** to enter into and perform the Parent Contract;
- **legal obligation:** for example safeguarding and child protection, attendance and admissions registers, returns to the Department for Education, and tax and VAT record keeping required by HMRC;
- **legitimate interests:** for example running the College efficiently, recovering unpaid fees and maintaining relationships with the College community; and
- **consent:** for certain uses only, such as some uses of images and some marketing communications.

Where we process special category data (for example health information or information relevant to safeguarding) we do so only where an additional condition in data protection law applies, such as safeguarding children, protecting someone's vital interests, the provision of health care or, where required, your explicit consent. The data the College holds will be the minimum it requires to form and maintain the contract between you and the College.

4. Who we share it with

The College may share your data with the following organisations who have contracts with the College and are required to protect your data to the standards required by data protection law. These are:

- Sodexo, which provides catering services to the College
- Park View Health Partnership and the Sussex Community NHS Foundation Trust
- Microsoft and West Country Business Systems, the College's IT software providers
- IRIS (iSAMS), the College's management information system and parent portal
- [iFinance (confirm supplier name)], the College's fee billing system and parent portal
- SchoolBusNet
- AS Tracking
- unifrog (for UCAS data)
- Stevensons (the operators of the College shop)

We also share personal data where necessary with:

- Westbury Collections, the College's debt recovery agent, and our solicitors where fees remain unpaid.
- HMRC, the Department for Education, the local authority, the police and children's social care where the law requires it or to safeguard a child;
- the Independent Schools Inspectorate and other regulators; and
- the College's professional advisers, auditors and insurers.

5. Transfers outside the UK

Some of our suppliers (for example Microsoft) may store or access personal data outside the UK. Where this happens we make sure the transfer is lawful, for example because the country is covered by UK adequacy regulations (which include the EEA and, for certified organisations, the United States) or because the supplier has agreed the UK International Data Transfer Agreement or Addendum.

When the College organises an overseas trip we share with the trip provider, hosts and accommodation the information they need to run the trip safely, including relevant medical and dietary information. We do this because it is necessary for the trip and to protect the welfare of those taking part, so we do not need to ask for separate consent.

6. How long we keep it

Your child's data will be retained until the pupil reaches the age of 25, unless modified by any other legal obligation the College finds itself under (some safeguarding and special educational needs records must be kept for longer).

Your contact details and correspondence will be retained for 12 months from the end of the academic year during which your child leaves the College unless modified by any other legal obligation the College finds itself under.

Fee accounts, invoices and other financial records, including the VAT records HMRC requires us to keep, are retained for six years from the end of the financial year to which they relate. Where fees are outstanding we keep the relevant records until the matter is resolved and for six years afterwards.

If your child does not become a pupil of the College your data will be retained for 24 months from the date it was planned your child would join.

If you choose to stay in touch with the College after your child leaves, the College's alumni and friends notice will apply.

7. Where we get it from

We will obtain most of the data the College requires from you. We may also receive information from your child's previous school, from professionals or authorities working with your family, and from publicly available sources (see section 9). Where we obtain data from other sources we will tell you, normally within one month.

8. Whether you have to provide it

We see the provision of personal data as necessary to properly admit your child to the College and for the College to fulfil its obligations under the contract once your child is a pupil here. If you do not provide information we need (for example contact or medical details) the College may not be able to offer or continue a place safely.

9. Automated decisions and profiling

There is no automated decision making that has a legal or similarly significant effect on you. The College may research publicly available information about parents' occupations and interests to support its fundraising. This is a form of profiling. You can object to it at any time by contacting the Bursar and we will stop.

10. Your rights

Under data protection law you have the right to:

- ask for a copy of the personal data we hold about you (a subject access request);
- ask us to correct data that is inaccurate or incomplete;
- ask us to delete your data or restrict how we use it in certain circumstances;
- object to our use of your data where we rely on legitimate interests and object at any time to direct marketing;
- ask for data you have given us to be transferred to another organisation in certain circumstances; and
- withdraw your consent at any time where we rely on consent (this does not affect anything we did before you withdrew it or any processing for which we have another lawful basis).

Some of these rights are subject to exemptions. To exercise any of them please contact the Bursar.

11. Complaints

If you are unhappy with how the College has handled your personal data you have the right to complain to the College. Please send your complaint to the Bursar at bursar@hppc.co.uk or by post to the College. We will acknowledge your complaint within 30 days of receiving it, investigate it without undue delay and tell you the outcome. Data protection complaints are handled under the College's Complaints Procedure.

You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk or on 0303 123 1113. The ICO will normally expect you to have raised your complaint with the College first.

12. About this notice

This is a summary. It should be read with the College's full Privacy Notice.

This version was published in November 2026 and will next be reviewed by November 2028. Any substantial changes that affect your rights will be notified to you directly as far as is reasonably practicable.