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# COBHAM ACADEMY LTD (CAL)

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## PRIVACY NOTICE 2023

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SUBMISSION: January 2023

REVIEW: December 2023

### HOW WE USE YOUR INFORMATION

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This privacy notice tells you what to expect when Cobham Academy Ltd collects personal information. It applies to information we collect about:

- those enquiring about and participating in our sports camps
  - complainants and other individuals concerning data protection or Subject Access Request
  - current employees
  - members of the public visiting campsites that operate CCTV
  - visitors, staff, participants operating on our sites
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### THOSE ENQUIRING ABOUT AND BOOKING A COBHAM ACADEMY LTD CAMP

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If you make an enquiry regarding one of our camps via our website, by email or, as part of the registration process, we will retain your name/child's name and age and postcode information to allow the booking of a participant on a camp. This data will be retained for a maximum of one year.

Once booked onto a Cobham Academy Ltd camp the data will be used to formulate participant lists which are issued to the camp director and coaching staff.

Reg Number: 08749522

Reg Address: 5 - 9 Eden Street, Kingston Upon Thames, Surrey, KT1 1BQ



Thank you for completing the form (for those booking participants)

The data you have provided will be used for the management, registration and finance (to ensure accurate booking and payment) of Cobham Academy Ltd.

- The data will be retained securely by Cobham Academy Ltd and will be deleted within one calendar year
- The data has been gathered using the Wufoo Service. Full details regarding the processing of your data using Wufoo are set out below.

Wufoo is an online form builder that strives to provide the easiest way for you to collect information over the internet. Wufoo is used by people who are interested in creating forms to collect information or perform a variety of other tasks ("Form Creators") and by people who fill out these forms ("Form Respondents"). Wufoo is a service provided by SurveyMonkey.

This privacy statement describes privacy practices that are specific to Wufoo and should be read in conjunction with [SurveyMonkey's main Privacy Policy](#), which also applies to Wufoo to the extent that it is applicable and does not conflict with this privacy statement. In the event of any conflict between this Wufoo Privacy Statement and SurveyMonkey's main Privacy Policy, this Wufoo Privacy Statement shall prevail only concerning the terms that are specific to Wufoo, and SurveyMonkey's main Privacy Policy shall otherwise govern.

Infinity Box Inc. (the provider of Wufoo in the United States) complies with the [US-EU and US-Swiss Safe Harbor Frameworks](#) developed by the U.S. Department of Commerce regarding the collection, use and retention of personal information from EU member countries and Switzerland. We have certified that we adhere to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. View our certification on the U.S. Department of Commerce's [Safe Harbor website](#).

For questions regarding our privacy policy or practices, contact SurveyMonkey electronically via [this form](#). If you feel that your question has not been satisfactorily addressed, you may [contact BBB](#), which operates an independent dispute resolution mechanism.

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## PRIVACY FOR FORM RESPONDENTS

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### 1. WHAT INFORMATION DOES SURVEYMONKEY COLLECT?

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Response to forms. We collect and store the responses that you submit to forms. Form Creators are responsible for this data and manage it. A form may ask you to provide personal information or data. If you have any questions about a form you are completing, please contact the Form Creator who created the form directly as SurveyMonkey is not responsible for the content of that form. The creator of the form is usually the same person that invited you to complete the form and sometimes they have their privacy policy. SurveyMonkey is not liable for any actions or inactions a Form Creator takes concerning any data or information that they may collect from a Form Respondent.

### 2. HOW DOES SURVEYMONKEY USE THE INFORMATION WE COLLECT?

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We disclose the information we collect under [SurveyMonkey's main Privacy Policy](#) for survey respondents (except that references to surveys and survey data should be read as references to forms and form data in the context of Wufoo).

### 3. WITH WHOM DO WE SHARE OR DISCLOSE YOUR INFORMATION?

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We disclose the information we collect in accordance with [SurveyMonkey's main Privacy Policy](#) for survey respondents (except that references to surveys and survey data should be read as references to forms and form data in the context of Wufoo).

### 4. WHAT ARE YOUR RIGHTS TO YOUR INFORMATION?

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Contact the relevant Form Creator to access your responses. Because we collect form responses on behalf of Form Creators, you will need to contact the Form Creator if you have any questions about the form or want to access, update or delete anything in your responses. We provide Form Creators with tools to maintain the responses they collect via their forms. SurveyMonkey cannot provide you with this access since form responses are the Form Creator's private information.

### 5. SECURITY, COOKIES, AND OTHER IMPORTANT INFORMATION

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Security. Each Form Creator is assigned a unique username and password which is required to access his or her Wufoo account. It is each Form Creator's responsibility to protect the security of his or her login information. Regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorised third parties as a result of collecting and transmitting your data over the internet.

Cookies. See SurveyMonkey's main Privacy Policy for general information about cookies. [Click here](#) for information about specific cookies used by Wufoo.

Changes to this privacy statement. This privacy statement may be changed in the same manner as changes that are made to SurveyMonkey's main Privacy Policy.



Cobham Academy Ltd

Online tracking. We currently do not process or comply with any web browser's "do not track" signal or other similar mechanisms that indicates a request to disable online tracking of individual users who visit the Wufoo website or use the Wufoo services.

The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you regarding Cobham Academy Ltd only.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

## COMPLAINANTS AND OTHER INDIVIDUALS IN RELATION TO DATA PROTECTION OR SUBJECT ACCESS REQUEST

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When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile statistics showing information like the number of complaints we receive, but not in a form that identifies anyone.

We usually must disclose the complainant's identity to whomever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

## CURRENT EMPLOYEES

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We hold personal data (including medical information) relating to staff members. It is possible (dependent on the host site used for the respective camp) that CCTV images of staff members will be captured in the day to day operational running of the camp and are recorded in line with the CCTV Policy of the host site.

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## MEMBERS OF THE PUBLIC OPERATING IN CLOSE PROXIMITY TO OUR CAMPS

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It is possible (dependent on the host site) that CCTV images recorded by the systems on the respective site will capture images. These images are stored on encrypted SIM cards for a maximum of 28 days and viewed in line with the procedures detailed within the host site CCTV policy.

## VISITORS, STAFF, PUPILS OPERATING ON OUR SITES

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CCTV images of visitors, staff and participants will be captured in the day to day operational running of the camp (dependent on host site) and are recorded in line with the host site CCTV policy.

## USE OF DATA FOR MARKETING PURPOSES

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We will not use the data collected as detailed above for any purposes related to Marketing activities (save for the promotion of Cobham Academy Ltd camps) and we will not share it with other organisations other than for the purposes highlighted in this notice.

## CHANGES TO THIS PRIVACY NOTICE

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We keep our privacy notice under regular review. This privacy notice was last updated on 17<sup>th</sup> September 2021.

## USE OF THIRD-PARTY ORGANISATIONS BASED OUTSIDE THE EUROPEAN ECONOMIC AREA

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We do use a third party organisation based outside the European Economic Area to operate our on line enquiry system - Infinity Box Inc. (the provider of Wufoo in the United States) Infinity Box Inc complies with the [US-EU and US-Swiss Safe Harbor Frameworks](#) developed by the U.S. Department of Commerce regarding the collection, use and retention of personal information from EU member countries and Switzerland. They have certified that they adhere to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. View their certification on the U.S. Department of Commerce's [Safe Harbor website](#).

Further details can be found above.

## COMPLAINTS OR QUERIES

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Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information, we hold about you.

Cobham Academy Ltd tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

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Cobham Academy Ltd

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Cobham Academy Ltd's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact us at the address below.

## ACCESS TO YOUR DATA

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Cobham Academy Ltd tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' in writing under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form
- Please note CCTV and personal data is made available as long as it does not infringe on the rights of other person's personal data i.e. images cannot be shared if they show someone else whose permission cannot be obtained.

## ERRORS

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If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Data Controller at the address below.

## ERASURE

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You can also ask us to delete the data we hold about you by, once again contacting the Data Controller at the address below.

## HOW TO CONTACT US

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If you want to request information about our privacy policy you can email us or write to:

Data Controller  
Cobham Academy Ltd  
56 West Farm Av  
Ashtead  
Surrey  
KT212JY

Reg Number: 08749522

Reg Address: 5 - 9 Eden Street, Kingston Upon Thames, Surrey, KT1 1BQ