

# Privacy Notice: Website Users

This is the privacy notice of The Evolve Trust, Company Number: 07827747  
Registered Office: c/o The Beech Academy, Fairholme Drive, Mansfield,  
Nottinghamshire, England, NG19 6DX

**Statement Purpose:** This notice describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual or which could be used to identify you if combined with other information. Acting in any way on personal data is referred to as 'processing'.

This notice applies to personal data collected through our website and through social media platforms and online retail platforms, including [names of websites, e.g. Facebook, Instagram, Twitter, Etsy, eBay and Amazon].

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

**Data Controller:** The Evolve Trust  
c/o The Beech Academy, Fairholme Drive, Mansfield, Nottinghamshire,  
NG19 6DX

**Data Protection Officer:** Alex Walker, [DPO@evolvetrust.org](mailto:DPO@evolvetrust.org)

## How we obtain personal data

The information we process about you includes information:

- You have directly provided to us.
- As a result of monitoring how you use our website.

## What personal data do we use?

When you use our website we ask you to provide personal data. This can be categorised into the following groups:

- Personal identifiers, such as your first and last names, your title and your date of birth.
- Contact information, such as your email address, your telephone number and your postal addresses for communication.
- Records of communication between us including messages sent through our website, email messages and telephone conversations.

## Why do we use this data?

We use this data to:

- Support communication methods
- Understand and analyse user requirements

## **Our use of aggregated information**

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether a feature of our website is useful.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy notice.

## **Special personal data**

Special personal data is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

It also includes information about criminal convictions and offences.

We do not collect any special personal data about you.

## **What is our legal basis for using this data?**

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data is no longer relevant, then we shall immediately stop processing your data.

If the basis changes, then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## **Information we process because we have a contractual obligation with you**

When you contact us via our website you are agreeing to our terms and conditions and a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal data.

We may use it in order to:

- verify your identity for security purposes
- provide you with information as per your request

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### **Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information, you provide your consent to us to process information that may be personal data.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, we ask you to agree to our use of non-essential cookies when you access our website.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [office@evolvetrust.org](mailto:office@evolvetrust.org) However, if you do so, you may not be able to use our website further.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not to process your personal data, the withdrawal of your consent does not necessarily prevent us from continuing to process it. The law may allow us to continue to process your personal data, provided that there is another basis on which we may do so. For example, we may have a legal obligation to do so.

### **Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- making improvements
- record-keeping for the proper and necessary administration of The Evolve Trust
- responding to unsolicited communication from you to which we believe you would expect a response

- preventing fraudulent use
- exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property
- insuring against or obtaining professional advice that is required to manage The Evolve Trust risk
- protecting your interests where we believe we have a duty to do so

### **Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal data.

### **Information we process to protect vital interests**

In situations where processing personal information is necessary to protect someone's life, where consent is unable to be given and where other lawful bases are not appropriate, we may process personal information on the basis of vital interests.

For example, we may inform relevant organisations if we have a safeguarding concern about a vulnerable person.

### **How and when we process your personal data**

#### **Your personal data is not shared**

We do not share or disclose to a third party, any information collected through our website.

#### **Information you provide**

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

For example, when you leave a review or post a message on our website, we reasonably assume that you consent for the message to be seen by others. We may include your username with your message, and your message may contain information that is personal data.

Other examples include:

- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal data, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

We provide you with a public profile page, the information on which may be indexed by search engines or used by third parties. The information you provide on that profile page may be made available to the public.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal data that you have posted. You can make a request by contacting us at [office@evolvetrust.org](mailto:office@evolvetrust.org)

### **Payment and Direct Debit Information**

Payment is never taken by us or transferred to us either through our website or otherwise. Direct debit arrangements are never set up.

### **Job application and employment**

Please refer to our privacy statement for job applicants  
<https://www.evolvetrust.org/work-with-us/privacy-notice-for-job-applicants/>

### **Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any cookie you choose. It should also allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you may not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed into our website

### **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed into our website.

### **Your Rights**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

If you feel it necessary to do any of the above, you can speak with the Data Protection Officer. The school/trust does not have to meet all of your requests and we will let you know where we are unable to do so.

### **Use of our services by children**

If you are under 18, you may use our website only with consent from a parent or guardian.

We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.

### **Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### **Communicating with us**

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our website.

We may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

### **Retention period**

Except as otherwise mentioned in this privacy notice, we keep your personal data only for as long as required by us:

- to provide you with the services you have requested
- to comply with other law, including for the period demanded by our tax authorities
- to support a claim or defence in court

### **Compliance with the law**

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR') and the Privacy and Electronic Communications Regulations ('PECR').

### **Review of this privacy policy**

We shall update this privacy notice from time to time as necessary.

### **Complaining**

We take any complaints about our collection and use of personal information very seriously. If you have a concern about the way we are collecting or using your personal data and you think this is unfair, misleading or inappropriate, or any other concerns, please raise this with us in the first instance and contact our Data Protection Officer.

Alternatively, you can raise any complaints to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Alex Walker (Data Protection Officer), [DPO@evolvetrust.org](mailto:DPO@evolvetrust.org)

The Evolve Trust, c/o The Beech Academy, Fairholme Drive, Mansfield, Nottinghamshire, NG19 6DX

*This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this school.*