



Wolsey Hall

FLEXIBLE LEARNING FOR SCHOOLS

Wolsey Hall For Schools
Privacy Notice for Schools
31 July 2024

Document Version Control Log

Version	Date	Description of changes
1	31/07/2024	
1.1	31/07/2025	Next scheduled update.

1. Introduction

This document sets out how Wolsey Hall Oxford International Ltd. trading as Wolsey Hall for Schools, (the “Company”) collects, uses, processes and shares personal information of students when you use our website and services. As a leading provider of integrated education systems, the privacy and security of individuals about whom we process personal data is critical to us. This Global Privacy Notice (“notice”) explains how we manage and protect your personal data (referred to as “data”) when you visit our website (“Visitor”) or use our services either as a representative of a School to which we provide services (“School User”) or a student or parent of a School which uses our services (a “Service User”). If you are a Service User, for the majority of personal data we process about you, we are a processor and act on your School's behalf and as directed by them. We recommend that you review your School's privacy notice to understand how your school manages your personal data.

This notice tells you who we are, what data about you we collect in connection with our website and services, and what we do with it. This privacy notice is subject to regular updates and significant changes will be communicated to Users.

2. Who are we?

Wolsey Hall for Schools (“WH,” “we,” “us”) is part of Faria International Group and has a mission to provide high-quality education to students wherever they happen to be in the world at a time and pace which suits their individual needs. For more information about Wolsey Hall for Schools please visit our website <http://www.wolseyhallforschools.org.uk>, which sets out our services (“Services”).

Details of how to contact us if you have questions can be found below.

3. What data do we collect?

We use several types of data about you for purposes connected with the management of our website or the delivery of our learning platform services.

Visitor

We may collect and process the following information about you in order to provide you with our website or services:

- We will collect and process the information you provide to us if you register for a demonstration, blog, or webinar, which includes your name, email address, phone number, School name, information regarding the curriculum your School offers, and other information collected to provide the website or services. We will also process your name and email address to send you email messages about our newsletters, product updates and other marketing materials. We will only send you such email messages as permitted under applicable law and in line with your marketing preferences which you can update at any time as described below.
- We will collect information through cookies, including analytics information about your use of our website and information about your device, internet connection, browser, location, page, and search terms used, etc. Learn more about how we use cookies and similar technologies in our [cookies policy](#).

School User

We may collect and process the following information to provide your School with our learning platform services:

- your name, title, business telephone number, details about the School you represent, details about your position at the School (e.g. subjects you teach or how long you have worked at the School) and email address used during our registration process in order to communicate with you in relation to the provision of learning platform services to your School.
- responses to our surveys you choose to take.
- your email address to send email marketing to you, including our newsletters and updates as permitted under applicable law and in line with your preferences.
- details of your interactions with us when you contact us with enquiries through our online customer support, or via telephone or email.

Service User

We may collect and process the following information:

- information captured in your student account, provided by you or your parents including information such as your name, email address, nationality, date and place of birth, gender, language, and parents' names and contact details, in order to conduct statistical analyses for our own reporting.
- email address to request survey responses or feedback from you.
- feedback and responses to our surveys you choose to take.

- details of your interactions with us when you contact us with enquiries through our customer support system online, or via telephone or email.

4. For what purposes do we use data about you and on what legal basis?

Throughout your use of our website and/or our provision of services to you or a School, we use data about you for various purposes. The purposes for which we use data about you, with corresponding legal basis for use, are set out below:

Visitors

Purpose	Legal basis for Processing
<p><i>Management of our website</i></p> <p>e.g. site maintenance and analytics of website usage (which will include the sharing of data with Google Analytics).</p>	It is our legitimate business interest to manage and develop our website.
<p><i>Fulfilment of online services</i></p> <p>e.g. registering for a demonstration, webinar, blog, or trial account.</p>	We process your data to provide you with the online service which you have requested. Our processing is based on your consent.
<p><i>Marketing</i></p> <p>e.g. to send you marketing emails relating to product updates and other services we think you may be interested in</p>	We either rely on your consent or our legitimate business interest to send email marketing to you depending on how we collected your personal data and the nature of our relationship. Any email marketing will only be sent to you as permitted by applicable law and in accordance with your preferences which you can update at any time as described below.
<p><i>Legal & regulatory compliance and compliance with law enforcement requests</i></p>	In some instances, we will be required by law to process your personal data and share it with law enforcement or other government or regulatory bodies. We may also choose to do so in other circumstances, in accordance with our legitimate interests.
<p><i>Processing a job application</i></p> <p>e.g. if you apply for a job or position via our website</p>	If you decide to apply for a job with us, we will process your personal data based on our legitimate interests to ascertain your suitability for the job.

School Users

Purpose	Legal basis for Processing
<p>Customer support activities</p> <p>e.g., interacting with you via our online customer support or by phone, email</p>	It is our legitimate business interest to provide customer support to School Users to provide the learning platform services to schools.
<p><i>Provision and management of learning platform services to School</i></p> <p>e.g., managing requests, curriculum standards, managing user accounts, submitting a PO, handling invoices, etc.</p>	It is our legitimate business interest to provide and manage the learning platform services we provide to Schools.

<p><i>Marketing</i> e.g., to send you marketing emails relating to product updates other services we think you may be interested in</p>	<p>We either rely on your consent or our legitimate business interest to send email marketing to you depending on how we collected your personal data and the nature of our relationship. Any email marketing will only be sent to you as permitted by applicable law and in accordance with your preferences which you can update at any time as described below.</p>
<p><i>Sharing data with other third parties</i> Please see “Who do we share data with and for what purpose?” below.</p>	<p>It is our legitimate business interest to share data with third parties to assist with the purposes described below.</p>
<p><i>Legal and regulatory compliance and compliance with law enforcement requests</i></p>	<p>In some instances, we will be required by law to process your personal data and share it with law enforcement or other government or regulatory bodies. We may also choose to do so in other circumstances, in accordance with our legitimate interests.</p>

Service Users

Purpose	Legal basis for Processing
<p><i>Conducting statistical analyses for reporting</i> e.g., to conduct data analyses that enables us to improve and develop our services</p>	<p>It is our legitimate business interest to improve our services with statistical analyses and reporting.</p>
<p><i>Customer support activities</i> e.g., interacting with you via our online customer support or by phone or email</p>	<p>It is our legitimate business interest to provide customer support to Service Users.</p>
<p><i>Feedback and surveys</i> e.g., to request survey responses or feedback from you in relation to future product developments and educational plans</p>	<p>It is our legitimate business interest to gather feedback and survey results to improve user experience and develop improved services. We store this data in anonymised form.</p>
<p><i>Sharing data with other third parties</i> Please see “Who do we share data with and for what purpose?” below.</p>	<p>It is our legitimate business interest to share data with third parties to assist with the purposes described above</p>
<p><i>Legal & regulatory compliance and compliance with law enforcement requests</i></p>	<p>In some instances, we will be required by law to process your personal data and share it with law enforcement or other government or regulatory bodies. We may also choose to do so in other circumstances, in accordance with our legitimate interests.</p>

Please note that we do not process any special category data about Service Users (e.g., information on race or ethnicity) for our own purposes. You may be requested to provide such information by your School which may be passed to us for processing, but we do not use it for any other purpose.

In some instances, we may use your personal data in ways not described above. Where this is the case, we will provide a supplemental privacy notice that explains such use and consent if required. You should read any supplemental notice in conjunction with this notice.

5. Who do we share your data with and for what purposes?

We share data across our parent Faria Education [Group](#) for various purposes such as:

- Customer support activities (e.g. our online support or contacting us via our email or telephone) may be undertaken by colleagues in the UK.
- Management of our services (e.g. bulk process requests, importing curriculum standards, importing users) may be processed in the UK or India.
- Billing inquiries (e.g. receiving a purchase order, handling invoices, etc.) will be processed by our offices in the UK.
- System usage and platform hosting for the group is cloud-based in the UK, USA, Taiwan and Hong Kong, and data centres in Canada, USA Hong Kong, Singapore, Ireland, and UK. Wolsey Hall ensures that appropriate data transfer mechanisms to protect School personal data are always implemented.

Sharing data with third parties

- Wolsey Hall ensures that appropriate data transfer mechanisms to protect School personal data are always implemented. If data is transferred to third parties outside the EU, this is based on a European Commission adequacy decision, Binding Corporate Rules, or the EU Model Clauses (Standard Contractual Clauses). End user data (parent, student, and teacher) is not transferred outside of the EEA at any point except in specific circumstances when using some Subprocessors. These transfers are covered in the data processing agreements and are subject to appropriate safeguards as per the UK GDPR and DPA 2018. Data transfers to the US require Standard Contractual Clauses.
- We may share data about Service Users with education partners, such as exam awarding bodies for exam registration, or integration partners, such as other school systems providers.
- We may share data about you with our third-party service providers, such as IT providers or customer support services.
- We may share anonymised data, feedback, and survey results with third-party service providers, such as other school systems for research purposes.
- We may share data about you with other third parties, where required or permitted by law, for example: regulatory authorities; government departments; in response to a request from law enforcement authorities or other government officials;
- We may share data when we consider disclosure to be necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal purpose; and
- We may share data in the context of organisational restructuring.

If you would like to learn more about the parties with which we share data, please contact us using the details below at ***Who should you contact with questions?***

6. Where might your data be processed?

As a result of the global nature of our services, we are often required to transfer data internationally as described above. Accordingly, data about you may be transferred both within our Group and to third parties internationally.

These countries may not have the equivalent data protection standards to the country in which you provided your data. We will ensure that we implement appropriate data transfer mechanisms to protect your personal data. If data is transferred outside the EU, this will only be transferred on the basis of a European Commission adequacy decision, Binding Corporate Rules, or the EU Model Clauses (Standard Contractual Clauses). In addition, OpenApply no longer relies on Privacy Shields for transfers to the US, this is now covered by Standard Contractual Clauses.

Wolsey Hall in the United Kingdom is registered with the ICO and any transfers to our internal group offices are governed by Binding Corporate Rules or standard contractual clauses.

7. How do we protect your data?

Wolsey Hall implements appropriate technical and organisational measures to protect personal data that we hold from unauthorised disclosure, use, alteration, or destruction. Our standard protocols include:

Application security: traffic encryption, strongly hashed passwords, multifactor authentication, safeguards against vulnerabilities such as cross site scripting, SQL injections, phishing, and others.

Network security: firewalls and systems to detect suspicious behaviour, stop malicious attempts to gain access, or compromise the resilience of the service (e.g., DDOS attacks).

Organisational security: access policies, audit logs, risk assessments and confidentiality agreements.

8. How long will data about you be kept?

The period for which we may retain data about you will depend on the purposes for which the data was collected, whether you have requested the deletion of the data, and whether any legal obligations require the retention of the data (for example, for regulatory compliance).

We will not retain data about you for longer than is necessary to fulfil the purposes for which the data was collected.

9. What rights do you have over your data?

Depending on where you are resident, you may have some or all of the following rights under applicable law in respect of data about you which we hold:

- request us to give you access to it, and have us provide you with a copy of any data we hold about you
- request us to rectify or update it
- request us to erase it in certain circumstances
- request us to restrict our using it, under certain circumstances
- object to our using it, in certain circumstances
- withdraw your consent to our using it, where our processing is based on consent
- data portability, in certain circumstances

- opt out from our using it for email marketing. You may opt out by clicking on the unsubscribe link in the email marketing messages we send you or by contacting us as set out below and we will always comply with this request; and
- lodge a complaint with the supervisory authority in your country (if there is one).

You can exercise these rights, or learn more about them, by contacting us using the details below at ***Who should you contact with questions?***

We may be required to confirm your identity before we act on any request from you in connection with your data. This may involve asking you to provide identification documents.

10. Who should you contact with questions?

For any data compliance or data privacy questions, please contact our Data Compliance Officer at dataprivacy@wolseyhalloxford.org.uk

If you have any GDPR questions, or wish to exercise any of your rights, you can also contact our external Data Protection Officer SchoolPro TLC at GDPR@schoolpro.uk

If your country has a relevant (data protection) supervisory authority, you have a right to contact it with any questions or concerns. If we cannot resolve your questions or concerns, you also have the right to seek judicial remedy before a national court.

11. Changes to this notice

We may update this notice (and any supplemental privacy notice), as shown below. We will notify Users of the changes where required by applicable law to do so.

GDPR Privacy and Data Protection Addendum

Key Principles

“Data Protection Requirements”: as applicable: (i) the Data Protection Act 2018, the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) or equivalent legislation, and all other applicable laws (including judgments of any relevant court of law) and regulations relating to the processing of personal data, data privacy, electronic communications, marketing and data security, in each case as amended, extended or re-enacted from time to time and all orders, regulations, statutes, instruments or other subordinate legislation made thereunder in any jurisdiction from time to time; and (ii) the guidelines, recommendations, best practice, opinions, directions, decisions, codes of practice and codes of conduct issued, adopted or approved by the UK’s Information Commissioner’s Office and/or any other supervisory authority or data protection authority from time to time in relation to the processing of personal data, data privacy, electronic communications, marketing and data security.

“Cross-Border Processing” or **“School Personal Data Transfers”** means any communication, copying or transmission of School Personal Data to a Third Country.

“School Personal Data” means any personal data processed or transferred by the School to Wolsey Hall in relation to the Services Agreement and in connection with the Services.

“Third Country” means any country that is not in the UK which has not been recognised by the UK GDPR as providing an adequate level of protection for personal data under the Data Protection Requirements.

1. DATA PROTECTION REQUIREMENTS

1.1. For the purpose of this Services Agreement, including this Privacy and Data Protection Annex, personal data and the terms process, data subject, data controller, controller, data processor, processor, sub processor, personal data breach and supervisory authority shall have the meanings given to them in the applicable Data Protection requirements.

1.2. The Parties acknowledge that the School is the data controller and Wolsey Hall is the data processor of School Personal Data.

1.3. The School remains solely liable for upholding data subject’s rights in relation to the processing of such School Personal Data under the Services Agreement, specifically their rights of access, right to request rectification and/or erasure and if necessary the right to object to processing, and the School shall promptly notify Wolsey Hall of any request relating to the same received from a data subject.

1.4. Each Party warrants that it shall comply with all of its obligations under the Data Protection requirements which arise in connection with the Services, or either party’s performance of its obligations, and that it shall not, in respect of any School Personal Data processed, do any act or make any omission which puts the other party in breach of its obligations under the Data Processing Requirements.

1.5. The School shall ensure that it has all necessary consents from data subjects or that another legal basis is satisfied under the Data Protection requirements in order for Wolsey Hall’s processing of School Personal Data to comply with the Data Protection requirements, including without limitation, processing for the purposes of providing international education systems for curriculum planning,

assessment, reporting & admissions and related services for students, parents, schools and exam boards.

1.6. The School's instructions relating to the processing of School Personal Data shall comply with the Data Protection Requirements and the Customer shall have the sole responsibility for the accuracy, quality, integrity, reliability, and lawfulness of the School Personal Data;

1.7. The School shall promptly notify Wolsey Hall if it becomes aware of any breaches of or other irregularities with the Data Protection Requirements.

2. WOLSEY HALL'S OBLIGATIONS

2.1. General Obligations

2.1.1. Wolsey Hall shall process School Personal Data for the sole purpose of the provision of the Services to the School and any members, and shall act only in accordance with the commercially reasonable documented instructions of the School in respect of the processing of School Personal Data during the term of the Services Agreement.

2.1.2. Wolsey Hall shall promptly notify the School if, in Wolsey Hall's opinion, the School's documented data processing instructions breach the Data Protection requirements, and Wolsey Hall shall be entitled without penalty to suspend execution of the instructions concerned, until the School confirms such instructions in writing. Any notification by Wolsey Hall under this clause should not be regarded as legal advice and Wolsey Hall shall not be required to perform a legal assessment of the School's instructions. The School shall seek its own legal advice on applicable Data Protection requirements. If and to the extent Wolsey Hall is unable to comply with any instruction received from the School, it shall promptly notify the School accordingly.

2.1.3. The purpose of Wolsey Hall's processing School Personal Data is the performance of the Services pursuant to this Privacy and Data Protection Addendum. The categories of data subjects and the types of School Personal Data processed under this Addendum are set out in Appendix 1 (School Personal Data).

2.1.4. Wolsey Hall shall provide reasonable assistance to the School to ensure the School's compliance with the Data Protection requirements and/or in case of inspection by a supervisory authority considering the nature of the processing and the information available to Wolsey Hall.

2.1.5. Wolsey Hall shall promptly respond to any request of the School concerning the processing of School Personal Data carried out by Wolsey Hall, and provide the School with all reasonable information, so that the School is able to: (i) inform the data subjects and respond to their requests for access, objection, rectification, restriction or deletion of School Personal Data; and/or (ii) respond to any administrative formalities concerning the processing of such personal data to the supervisory authority; and/or (iii) comply with all requests of any administrative or judicial authority regarding the processing carried out under the Services Agreement.

2.1.6. Wolsey Hall shall promptly correct any errors or inaccuracies in the School Personal Data which are notified to it either by the School or a data subject, or shall provide a means for the data subject to self-correct any errors or inaccuracies within such personal data, to ensure that such School Personal Data is kept accurate and up to date.

2.1.7. Wolsey Hall shall provide reasonable assistance to the School to ensure its compliance with its

obligations to maintain a record of all categories of School Personal Data processing activities. Wolsey Hall shall record and make available such School Personal Data for a period of eighteen (18) months from the Services Agreement expiration or termination date and shall ensure that the School Personal Data records are backed-up regularly throughout this period. Thereafter, Wolsey Hall shall destroy all files containing School Personal Data or return all such School Personal Data to the School, unless required to retain any or part of the School Personal Data by applicable law.

2.2. SECURITY

2.2.1. Wolsey Hall shall implement appropriate technical and organisational security measures necessary for the processing of School Personal Data and Services to be performed under this Services Agreement to ensure the confidentiality and security of School Personal Data and, in particular, to prevent such School Personal Data from being distorted, damaged or communicated to unauthorized third-parties, and to protect the School Personal Data against any accidental or unlawful destruction, accidental loss, alteration, dissemination and/or unauthorized access, as well as against all unlawful forms of processing provided that, such measures shall ensure a level of security appropriate to the risks inherent in the processing and the nature of the School Personal Data to be protected.

2.2.2. In case of a personal data breach involving School Personal Data, Wolsey Hall shall:

(i) notify the School without delay after becoming aware of an actual personal data breach involving School Personal Data, and;

(ii) take steps to remedy such personal data breach involving School Personal Data as soon as possible to minimise the impact of any personal data breach to all relevant data subjects.

2.2.3. Such notification must contain:

1. A description of the nature of the personal data breach including:
 - a. Categories of School Personal Data concerned;
 - b. Approximate number of data subjects concerned;
 - c. Categories of School Personal Data records concerned;
 - d. Approximate number of School Personal Data records concerned, and;
2. A description of the consequences of the personal data breach involving School Personal Data and;
3. A description of the measures taken or proposed to be taken by Wolsey Hall to address such personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

2.2.4. Wolsey Hall shall document any personal data breach involving School Personal Data, comprising the facts relating to it, its effects and the remedial action taken.

2.3. ACCESS TO PERSONAL DATA

2.3.1. In accordance with confidentiality obligations as defined in the Services Agreement, Wolsey Hall shall not transfer, communicate or disclose in any manner any personal data to any third parties, except to those subcontractors and personnel required to provide the Services to the School (hereinafter the "Authorised Recipients") for the sole purpose of such Authorised Recipients of performing the Services under the Services Agreement. Where a subcontractor is engaged by Wolsey Hall, we shall ensure that they are appointed in accordance with clause 2.4 below.

2.3.2. Wolsey Hall shall ensure that the Authorised Recipients in charge of the performance Services process the School Personal Data only on a need-to-know basis and are subject to appropriate

obligations of confidentiality and security and bound by a non-disclosure agreement that is least as stringent as the one in force between the parties.

2.3.3. In case of any investigation or seizure of School Personal Data by government officials, a supervisory authority or any law enforcement authority, Wolsey Hall shall take reasonable steps at its disposal to protect the confidentiality of School Personal Data.

2.3.4. If a Party is compelled to disclose School Personal Data by law, such Party shall promptly notify the other Party of the disclosure order (if and to the extent permitted by laws and/or regulations).

2.4. PERSONAL DATA TRANSFERS

2.4.1. As part of the Services, the School acknowledges that Wolsey Hall may transfer School Personal Data internationally as part of its business operations to facilitate the provision of the Services to the School. Where Wolsey Hall transfers personal data to a third country, it shall take steps to ensure that it has appropriate safeguards in place to protect the School Personal Data in accordance with Data Protection requirements. Further information about the transfers and the basis on which those transfers are made is set out in this paragraph 2.4.

2.4.2 The School provides its prior consent to Wolsey Hall transferring School Personal Data between its group companies in the UK, USA, Taiwan, and Hong Kong, and data centres in Canada, USA, Hong Kong, Singapore, Ireland, and the UK. Where required by Data Protection requirements, appropriate safeguards shall be in place to cover such transfers. Where personal data is transferred outside of the UK, Wolsey Hall has entered into standard contractual clauses issued by the European Commission and recognised under the UK GDPR. Alternatively, where necessary, it has entered into equivalent data transfer mechanisms approved by the UK Information Commissioner's Office (ICO) such as an International Data Transfer Agreement (IDTA), as required under the Data Protection requirements.

2.4.3. We may disclose your personal information to other data controllers and with our trusted suppliers to provide our services to you. Our suppliers may process School Personal Data on behalf of Wolsey Hall ("Subprocessors") for Wolsey Hall to provide the Services to the School. The school provides its general authorisation to Wolsey Hall's use of third-party suppliers to provide our services to you as follows:

To provide our courses: We share the name and email address of enrolled students and, where relevant their parents/guardians with our learning management system partner, [Instructure](#), to create Student and Parent Observer accounts to fulfil our contract to you to provide courses. Instructure share information with us that is provided by students and parent observers during interactions with our courses on Canvas including assignment submissions, grades and messages and participation statistics. Instructure is the joint data controller of the personal information that is collected when you interact with our courses.

Our customer relationship management system *OpenApply* stores contact information of our students and families; the Privacy Policy can be found here

<https://www.faria.org/terms/openapply/terms/terms-of-service>

To order books: We provide the contact details needed to our book suppliers to fulfil our contract to provide course books. Our book suppliers and couriers are the data controller of information provided to them. They provide further information about how they process your personal information in their privacy policies:

[AMAZON](#)

[MALLORY](#)

[DHL](#)

[ROYAL MAIL](#)

To process payments: We use Stripe to process online payments. Stripe provides us with details of payments made including name, service, date, and amount. They do not share your billing information with us. Stripe are the data controller of information provided to them via our web forms. You can see their privacy policy [here](#). We also use NetSuite, and you can find their privacy policy [here](#).

To provide our services: We work with third-party companies who support our website for payment processing, accounting, marketing, communication, and other services which may require them to access information, such as [Hubspot](#), [Zendesk](#), [Calendly](#), [Zoom](#), [Teams](#) etc.

If a service provider needs to access our client's personal information to perform services on our behalf, they do so under our instructions. We do not share your information with third parties for their own purposes.

When you consent to our marketing emails, you may be added to our engaged audience group that can be shared with Google so that dedicated ads are shown to you ([Google Ads](#) remarketing).

We may disclose your personal information:

- If we are under a duty to do so to comply with any legal obligation;
- In order to enforce or apply our terms and other agreements;
- To protect our rights or property;
- To protect the safety of our clients including with healthcare, social and welfare advisors and with central and local government.

If we sell, transfer, or merge our business or assets in future and, as a result, share your data with other parties, they may use your data in the same way as set out in this notice. If your data becomes subject to a different privacy policy, we will contact you in advance.

2.4.4. Wolsey Hall shall provide updates to the list of Subprocessors and proposed Subprocessors; Schools may object in writing to the processing of its Personal Data by a new Subprocessor within thirty (30) days following the update of the list of Subprocessors and such objection shall describe School's legitimate reason(s) for objection. If a School does not object during such time, the new Subprocessor(s) shall be deemed accepted.

2.4.5. Wolsey shall include in any contract with its Sub processors which will process School Personal Data obligations on such Sub processors which are equivalent to those obligations imposed upon Wolsey Hall in this Privacy and Data Protection Addendum. Wolsey Hall shall be liable for the acts and omissions of its Sub processors to the same extent that Wolsey Hall would be liable if performing the services of each Sub processor directly under the terms of this Privacy and Data Protection addendum.

2.4.6. Where Subprocessors are in a Third Country, Wolsey Hall shall put in place appropriate safeguards to protect the School Personal Data and ensure that such transfers of School Personal Data are in accordance with the UK GDPR Data Protection Requirements.

2.5. Information (Subject Access) Requests & Review

2.5.1. The School shall be entitled to request information and review Wolsey Hall's documents, processes and workflows relating to its internal Data Protection, Data Retention and Compliance standards and its obligations set out in this Privacy and Data Protection Addendum. The School shall also be entitled to request Wolsey Hall to contribute to and allow for audits and inspections by the School. The School may not exercise its audit right more than once in any twelve-month period. The School shall use all reasonable endeavours to ensure that the conduct of any audit by the School or its authorised agents does not unreasonably disrupt Wolsey Hall or its business. Any audit by the School

or its authorised agents will be limited to an audit of the School Personal Data and the processes relating to the School Personal Data and will not include any information relating to any other customer of Wolsey Hall or any other third party. The School will be responsible for any fees or costs incurred from carrying out such an audit.

Any information and review requests can be directed to Wolsey Hall's Data Compliance Officer at dataprivacy@wolseyhalloxford.org.uk

3. PERSONAL DATA PROCESSING CONDITIONS

3.1. Wolsey Hall's Server locations

3.1.1. Wolsey Hall informs the School that Personal Data will be hosted in servers located in the following countries: Canada, USA, Hong Kong, Singapore, Ireland, and UK.

3.1.2. Any change of the server(s) location by Wolsey Hall shall be promptly notified to the School and shall be included in the form of a written amendment pursuant to the conditions of this Services Agreement.

Appendix 1 School Personal Data

Categories of Data Subjects

Data subjects include:

Students, Parents/Guardians of students, Teachers, School Administrators ("Admin") and External Advisors.

Types of School Personal Data

The School Personal Data *may* include the following types of data:

Student First and Last Name

Student Year Level

Student Email Address

Student Password

Student Gender

Student DOB

Student Nationality

Student SEN Status

Student Activities

Student Grades

Student Address and Telephone

Parent(s) First and Last Name

Parent(s) Email Address

Parent Password

Parent(s) Phone Number

Tutor First and Last Name

Tutor Email Address

Tutor Password

School Admin First and Last Name

School Admin Role

School Admin Email Address

School Admin Password

School Admin Phone Number

School Name

School Address

Browser Type
Machine Model
Access Time
Referring URLs
Page Views
IP Address

Purposes

School Personal Data is processed by Wolsey Hall for the following purposes:

Providing international education systems for curriculum planning, assessment, reporting, admissions, activities management, and online payments and related services for Students, Parents, Schools, and Exam boards.