

Sophia HIGH SCHOOL

**Privacy Notice to Parents and Students
2025-2026**

Privacy Notice to Parents and Students

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Privacy Notice to Parents and Students

Introduction

Sophia High School is committed to protecting the privacy and security of personal information. This notice explains how the school collects, uses, and discloses personal information about students and their families.

We are committed to protecting and respecting your and your child's privacy. Sophia is an edtech company which is the parent group of Sophia High School. In this privacy notice, references to “**we**”, “**us**”, “**our**”, or “**Sophia**” is a reference to Sophia High School, the school which your child is attending, may be attending or has attended.

This privacy notice sets out the basis on which any personal data we collect from you or your child, or that you provide to us, is handled by us. We also have a privacy policy for our pupils, this is available on our website.

Please read the following carefully to understand our views and practices regarding your and your child's personal data and how we will treat it.

We comply with all applicable data protection laws and regulations (“**Data Protection Legislation**”), which may include the General Data Protection Regulation 2016/679 and the Data Protection Act 2018. The Data Protection Legislation continues to change in the UK, following the UK's exit from the European Union and we continue to update our practices in light of these changes. For the purposes of the Data Protection Legislation, we are the data controller and our School Support Centre at Sophia Technologies, The Engine Room, Battersea Power Station, 18 Power Station Road, London, UK, SW11 8HZ

Privacy Notice for Parents

What Personal Data We Collect

We collect the following types of personal information for parents and students at Sophia High School:

- Contact details - names, addresses, email addresses, phone numbers of students and their parents/guardians
- Date of birth, year group, and photographs of students
- Academic records, test results, and school reports of students
- Medical and health information about students
- Attendance records
- Safeguarding and child protection reports and disclosures
- Special educational needs records/ EHCPs

- Behaviour and disciplinary records
- Bank / Credit Card Details of parents/guardians for school fee payments (processed by Third Party - STRIPE)
- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Online meeting recordings and transcripts from Google
- Information about your visits to our website, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.

Our website may contain links to and from the websites of our partner networks, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

How We Use Information From Other Sources

We may be working closely with third parties (including, for example, your child's previous or new school(s), medical practitioners, photographers, local and public authorities, suppliers, education authorities, payment and delivery services, debt collectors, lawyers and credit reference agencies) and may receive information about you from them.

How We Use Personal Information

We use personal information to:

- Provide education services and monitor academic progress
- Keep students safe (emergency contacts, etc)
- Comply with legal obligations for record keeping and reporting
- Assess and improve our school services
- Process payments
- Send communications about school news, events or activities
- to deliver educational services to your child;
- to protect the welfare of your child, promote the objects and interest of our schools, ensure the most efficient management of the schools and ensure that the schools' legal obligations are adhered to;
- To store this information on the school's chosen management information system;
- To use your child's photograph as part of a manual ID system on the school management information system;

- To manage any queries or disputes you or your child may have with us or that we have with you or your child
- To enforce our terms of use with you or any other contract we may have with you (including the parent contract);
- To contact you in relation to your enquiry about a place at one of our schools, for example personal contact from the Admissions Team, sending a prospectus via post or digitally, or booking and confirming a visit;
- Where your child is attending one of our schools, to provide you with information about other similar services (for example, after school clubs or open days) we offer as part of the education and overall development of your child at the school;
- Once your child has left the school, to keep you up to date with key school news and upcoming events;
- To send out surveys to you by email as part of our Voice of the Parent campaign which is our school improvement tool; and
- To comply with government and regulatory guidance.
- In order to pursue legitimate interests, our school also relies on software applications and other technology to process personal data about you and your children. These include the school's management information system, virtual learning environments (including the setting of tasks and homework), revision tools, parents evening booking systems, text and email messaging communications, assessments of pupils' progress, our group-wide billing system and co-ordination of school trips. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your and your child's personal data is kept secure. Some of our key systems include MIS: Athena, Mathletics, Languagenut, Google Education Workspace, Labster, Canva and Stripe. For further information on the kind of technology we use, please contact our Data Protection Officer.
- We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you

In addition, we are required by law to do the following (which is not an exhaustive list):

- Keep an admissions and attendance register;
- Keep pupil files (including, where relevant, special education needs and child protection files);
- Keep a record of behaviour sanctions; and
- Provide an annual written report on pupil progress and attainment.
- Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to distinguish these as set out above. If you have any questions about these please contact our Data Protection Officer

- Where students are commissioned by Local Authority Partners we may act in the capacity as a joint controller to share relevant information regarding a student, their safeguarding, wellbeing and progress.
- When we hold sensitive personal data this means we must adopt higher standards of care to make sure this kind of data is safe and doesn't fall into the wrong hands. We may process sensitive personal data in the following circumstances:
- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations;
- Where it is needed in the public interest;
- For safeguarding;
- About your child's physical or mental health, or disability status, to ensure health and safety to provide appropriate adjustments, to monitor and manage sickness absence and to administer care; and
- About your race or national or ethnic origin, to e.g. for holiday requirements.

Google Workspace Service Data Processing

Introduction

This notice provides important additional information about how Google processes certain data related to your use of Google Workspace for Education services at Sophia High School. This information supplements our existing Privacy Notices and should be read alongside them.

What is Service Data?

In addition to the information you directly input into Google Workspace (known as "Customer Data"), Google also collects technical data about how you use their services. This technical information is called "Service Data" and includes:

- Information about your device (such as hardware model, operating system version, unique device identifiers, and mobile network information)
- Log information (such as details of how you used the service, IP address, and cookies)
- Location information (derived from various technologies including IP address)
- Usage statistics (such as how frequently you use particular features)
- Diagnostic data (information about service performance and error reports)

Google's Role as a Data Controller

Whilst Google processes most of your personal data on our behalf and under our instructions (as a "data processor"), Google also acts as a "data controller" for certain limited

purposes with regard to Service Data. This means that Google may use Service Data for their own limited purposes, such as:

- Maintaining and improving Google Workspace services
- Developing new features and functionality
- Protecting against security threats, fraud, and abuse
- Complying with legal obligations
- Conducting analytics to understand service usage patterns

Google has committed to only process Service Data as a controller for the limited purposes set out in the Google Cloud Privacy Notice Supplement. They have further committed not to use Service Data for advertising purposes, user profiling, or to sell Service Data to third parties.

Our Commitment to You

Sophia High School takes your privacy seriously. We have entered into the Google Workspace for Education Service Data Addendum to ensure that appropriate safeguards are in place for the protection of all data processed through Google Workspace, including Service Data.

The protections of Google's Cloud Data Processing Addendum now extend to Service Data, providing contractual assurances similar to those that apply to the information you directly input into Google Workspace.

For Students and Parents

For pupils under the age of 13, we rely on parental consent for the processing of personal data through Google Workspace, including Google's limited processing of Service Data as a controller.

For pupils aged 13 and over, we have determined that Google's processing of Service Data as a controller is necessary for our legitimate interests in providing effective online education, and is proportionate given the limited purposes for which Google may use the data and the safeguards that are in place.

Your Rights

The UK General Data Protection Regulation (UK GDPR) provides you with rights regarding your personal data, including the right to access, correct, delete, restrict processing of, and object to processing of your personal data.

These rights apply to Service Data processed by Google as a controller, and you can exercise these rights by contacting either:

- Sophia High School: Contact our Data Protection Officer, Mr Fernando Darcie at fernando.darcie@sophiahigh.school
- Google: Visit https://support.google.com/policies/contact/service_data_access

Further Information

For more detailed information about how Google processes Service Data as a controller, please refer to:

- The Google Cloud Privacy Notice:
<https://cloud.google.com/terms/cloud-privacy-notice>
- The Google Cloud Privacy Notice Supplement:
<https://cloud.google.com/terms/cloud-privacy-notice-supplement>

Online Meeting Recordings and Virtual Learning Environment

The school records certain online meetings and lessons conducted through Google Meet in accordance with UK data protection law and our educational obligations. We record meetings for:

- Safeguarding matters
- Attendance monitoring
- Behaviour management
- Educational continuity and oversight

Recording Notifications and Process:

- Google Meet automatically notifies all participants that recording is in progress
- This notification appears before joining and remains visible throughout the meeting
- Participants choosing to join acknowledge their awareness of recording

Management of Recordings: These recordings constitute personal data and are managed under UK GDPR and the Data Protection Act 2018. They are:

- Stored securely within our Google Workspace environment
- Accessible only to authorised staff with legitimate need
- Retained according to our retention schedule
- Protected by appropriate technical and organisational measures

Following Meetings:

- Detailed written minutes/summaries will be provided to relevant parties
- Recordings are retained as internal records only
- Access is restricted to protect participant confidentiality

Rights and Access: Whilst individuals have certain rights under data protection law, recordings often contain confidential information about multiple participants and may include safeguarding-sensitive content. Therefore:

- The school cannot share recordings due to our safeguarding obligations and the data protection rights of others
- Detailed minutes will be provided to document key points and agreed actions
- Any concerns about the recording process can be raised with our Data Protection Officer

Legal Basis: We process these recordings under our legal obligations for safeguarding in education, our public task as an educational institution, and our legitimate interests in maintaining accurate records of important meetings

We comply with the **Age Appropriate Design Code**, meaning that when we provide online services that children may use, we design them with children's needs and privacy rights in mind ico.org.uk.

Information we collect about you from our website

We will use this information for the following legitimate interests following submission of personal details on our website forms or in-house Admissions database portal:

- to contact you if you have made an enquiry to one of our schools via our online enquiry form;
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;
- to allow you and your child to participate in interactive features of our service, for example virtual learning environments, when you choose to do so; and
- as part of our efforts to keep our website safe and secure.

Information we receive from other sources

- We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a court order relating to you which impacts on our use of your and your child's information to protect the welfare of the child.
- Also, social services, health practitioners or public authorities may provide us with information (particularly sensitive personal data) about your child which may need to be added to the school's child protection or special educational needs file. This kind of processing of sensitive personal data may be necessary (a) for the purposes of carrying out our obligations in the field of social security or social protection law, (b) for medical diagnosis or provision of health care and/or (c) to protect the vital

interests of your child or another person taking into account the mental and physical capacity of your child.

In order to achieve the purposes described in the above paragraph, our school may do the following:

- rely on software applications and other technology to process medical information (such as allergies, accidents and injuries) about you and your children. For further information on the kind of technology we use, particularly in the context of processing sensitive personal data about your child, please contact our Data Protection Officer or Data Protection Coordinator.

When we disclose information

In order to pursue one of the legitimate interests set out above, we may share your and your child's personal information with:

- Sophia Technologies Support Centre in the UK;
- local authorities, education authorities (for example, Ofsted), the Department for Education, SEN coordinators, social services or the police where we have reason to believe there are safeguarding concerns in respect of your child;
- exam boards (for example, AQA, Cambridge Assessment, OCR, Pearson and WJEC) in order to successfully administer exams;
- where your child is not British, we may have to provide information about you or your child to UK Visas and Immigration;
- business partners, professional advisors, debt collector, suppliers and subcontractors for the performance of any contract we enter into with them or you; and
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use the terms of the parents' contract (between us and you) and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we need to get your consent

We will not market services to you without your consent and you have the right to ask us not to use your contact details for marketing.

- We will ask you to complete our Photo Consent Form for specific permission to use photos of your child.
- You or your child do not have to give us details about your child's race, religion or ethnicity if you do not want to. If you do provide us with this information, we only

use these details to assist us with the day-to-day running of the school and for equal opportunities monitoring purposes.

Data Sharing

We only share personal information with third parties when necessary for legitimate academic, health, and safety purposes. This may include:

- Other schools - during admissions and transfers
- Exam authorities - for registrations and certifications
- Health authorities - for mandated reporting and collaborating on student wellbeing
- Local Council Authorities - for children missing in education and safeguarding
- Technology providers - for educational software and platforms
- Auditors and advisors - for quality assurance purposes

We require third parties to maintain appropriate security to protect student information, and not to use the data for unauthorised purposes.

Data Security and Retention

We maintain appropriate technical and organisational measures to protect the security of personal data. Records are retained in accordance with legal requirements and our internal retention policies.

Data Subject Rights

Parents and students have the right to request access to personal data held about them by the school. Individuals also have the right to request correction, deletion, portability or restriction of their personal data, in accordance with data protection laws.

Please contact our Data Protection Officer to make a request or if you have any concerns about how we are processing personal data.

Data Retention - Student Records

How Long We Keep Student Information

We retain student data in accordance with education legislation, data protection law, and safeguarding requirements.

Key Retention Periods:

- **Student records and safeguarding files:** Until age 25 or 7 years after leaving (whichever is later)
- **Attendance records:** 3 years
- **Financial records:** 6 years

- **Digital learning materials:** Until completion of education plus 6 years
- **General communications:** 1-2 years

Legal Basis

These periods are required by education legislation, UK GDPR, and safeguarding guidance to support ongoing education, legal obligations, and child welfare.

Your Rights

Under the **Data (Use and Access) Act 2025**, you can request access to your child's records during these retention periods. We will conduct **reasonable and proportionate searches** when responding to your request ico.org.uk rather than exhaustive searches, and we will inform you if we believe further searches are disproportionate.

For full details, contact our Data Protection Officer at dataprotection@sophiahigh.school

Changes to this notice

We may update this notice from time to time. The current version will be posted on our website.

Contact Form

Information submitted through the contact form on our site is sent to our company email, hosted by Google. Google adheres to the EU/US “Privacy Shield” policy and you can find more information about this here: [Google Privacy Policy](#).

These submissions are only kept for admissions purposes; they are never used for marketing purposes or shared with third parties.

Google Analytics

We use Google Analytics on our site for anonymous reporting of site usage. So, no personalised data is stored. If you would like to opt-out of Google Analytics monitoring your behaviour on our website please use this link: [Google Analytics Opt-out](#).

Data Sharing

We only share personal information with third parties when necessary for legitimate academic, health, and safety purposes. This may include:

- Other schools - during admissions and transfers
- Exam authorities - for registrations and certifications
- Health authorities - for mandated reporting and collaborating on student wellbeing
- Local Council authorities - children missing in education & safeguarding
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Data Subject Rights

Parents and students have the right to request access to personal data held about them by the school. Individuals also have the right to request correction, deletion, portability or restriction of their personal data, in accordance with data protection laws. Please contact our Data Protection Officer to make a request or if you have any concerns about how we are processing personal data. Data is processed in accordance with GDPR and ICO guidelines with regards to Safeguarding.

Under the Data Protection Legislation, you and your child have the following rights:

Right to correction. You have the right to have inaccurate personal data about you or your child rectified.

The right to erasure. You have the right to request that we delete your and your child's personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.

Right to restriction. You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing.

Right to request transfer. In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third party organisation.

Right to object. You have the right to raise an objection to any of our processing in paragraphs 3.1 and 3.2. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.

Right to object to marketing. If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.

Right to complain to the ICO. Whilst we would always prefer it if you approached us first about any complaints or queries you may have; you always have the right to lodge a complaint with the Information Commissioner's Office.

Right to request access. You have the right to access personal data we hold about you. We encourage you to contact the school's Data Protection Co-ordinator and request our standard SAR form for you to complete in order to help us process your request.

Please contact our Data Protection Officer to make a request or if you have any concerns about how we are processing personal data.

Changes to this Notice

We may update this notice from time to time. The current version will be posted on our website.

Cookies

This site uses cookies—small text files that are placed on your device—to help the site provide a better user experience. **Under the Data (Use and Access) Act 2025, some cookies used purely for statistical or functional purposes may be set without your prior consent ico.org.uk.** You can still disable cookies in your browser or use the opt-out links we provide if you prefer. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics.

Cookies generally exist to make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the help section of your browser.

Data Protection Complaints

Enhanced complaints process: Under the **Data (Use and Access) Act 2025**, we provide an accessible complaints procedure for data-protection matters. You can submit a complaint via our online form, by email, telephone or post. We will acknowledge your complaint within **30 days** and respond without undue delay ico.org.uk.

Submit a Complaint Use our [online complaints form](#) to raise any data protection concerns. The form is designed to capture the information we need to investigate your complaint thoroughly.

Your Rights You retain the right to contact the Information Commissioner's Office (ICO) at any time about data protection matters, whether or not you use our internal complaints procedure first.

Contact the ICO:

Website: ico.org.uk

Telephone: 0303 123 1113

Alternative Methods If you prefer not to use the online form, you may also submit data protection complaints by email to dataprotection@sophiahigh.school or by post to:

Sophia High School,
Office 315,
The Engine Room,
Battersea Power Station
London,
SW11 8DZ

Privacy Notice for Students

Introduction

Sophia High School is committed to protecting your privacy. This notice explains how the school collects, uses, and shares information about you.

What Personal Information We Collect

We collect these types of personal information:

- Your name, date of birth, grade, student ID, and photograph
- Contact details - your address, email, phone numbers
- Your academic records and test results
- Medical information that impacts your schooling
- Your attendance and behaviour records
- Videos from lesson recordings via Google Classroom / Google Meet

How We Use Your Information

We use your information to:

- Provide you with education services
- Monitor your academic progress and identify any special needs
- Protect your health, safety and welfare while in school
- Assess and improve our school services and curriculum
- Comply with our legal obligations for record-keeping and reporting

How the School Uses Your Information

We will use the information you and your parents give us as is necessary to provide you with the information and services that your parents request from us (to look after you, teach you

and to deal with any queries they may have). We are also required by law to take a register, keep a personal file about you, keep a record of your behaviour and provide a written report on your progress.

We also use your information to promote the objects and interests of our schools, ensuring the most efficient management of the school and ensuring that the school's legal obligations are adhered to; and use your photograph as part of a manual ID system. These are known as **"legitimate interests"**.

Sensitive Personal Data

When we hold details about your health and wellbeing, this information is called **"sensitive personal data"** which means we treat this information even more carefully. We will need to hold sensitive personal data about you (a) for carrying out our obligations in the field of social security or social protection law, (b) for identifying medical problems or provision of health care or (c) to protect your vital interests. To achieve this, we may also use software applications and other technology.

Where We Need Your Consent

We will seek your or your parent's permission (and your permission, if you are 12 or older) if we would like to post any photographs of you on any of our marketing materials (including our prospectus or website); you and your parents may withdraw your permission should you wish.

You do not have to give us details about your race, religion or ethnicity if you do not want to. If you do, we will use this to help run the school (e.g. if your religion means that you have certain dietary requirements) and to monitor equal opportunities. You can ask us to delete this information at any time.

Transfer of Personal Information Outside the Country

Sometimes your information will need to be sent to, and stored outside the UK. We try to limit this, but it may be necessary where, e.g. one of our suppliers stores your information outside of the UK. We take all steps reasonably and legally necessary to ensure that your information is safe.

Data Sharing

We only share your information when necessary for academic, health, and safety purposes, including with:

- Your parents/guardians
- Other schools - during transfers
- Health providers - for medical needs and mandated reporting
- Exam authorities - for registrations and certifications

- Technology providers - for educational software and platforms

Data Security and Retention

We use appropriate security measures to protect your personal information. Records are retained in accordance with legal requirements and our policies.

Your Data Rights

You have the right to request access to personal data we hold about you, and request correction, deletion, restriction or portability of your information, in accordance with data protection laws. Please contact our Data Protection Officer with any concerns.

Google Workspace Service Data Processing

Introduction

This notice provides important additional information about how Google processes certain data related to your use of Google Workspace for Education services at Sophia High School. This information supplements our existing Privacy Notices and should be read alongside them.

What is Service Data?

In addition to the information you directly input into Google Workspace (known as "Customer Data"), Google also collects technical data about how you use their services. This technical information is called "Service Data" and includes:

- Information about your device (such as hardware model, operating system version, unique device identifiers, and mobile network information)
- Log information (such as details of how you used the service, IP address, and cookies)
- Location information (derived from various technologies including IP address)
- Usage statistics (such as how frequently you use particular features)
- Diagnostic data (information about service performance and error reports)

Google's Role as a Data Controller

Whilst Google processes most of your personal data on our behalf and under our instructions (as a "data processor"), Google also acts as a "data controller" for certain limited purposes with regard to Service Data. This means that Google may use Service Data for their own limited purposes, such as:

- Maintaining and improving Google Workspace services
- Developing new features and functionality

- Protecting against security threats, fraud, and abuse
- Complying with legal obligations
- Conducting analytics to understand service usage patterns

Google has committed to only process Service Data as a controller for the limited purposes set out in the Google Cloud Privacy Notice Supplement. They have further committed not to use Service Data for advertising purposes, user profiling, or to sell Service Data to third parties.

Our Commitment to You

Sophia High School takes your privacy seriously. We have entered into the Google Workspace for Education Service Data Addendum to ensure that appropriate safeguards are in place for the protection of all data processed through Google Workspace, including Service Data.

The protections of Google's Cloud Data Processing Addendum now extend to Service Data, providing contractual assurances similar to those that apply to the information you directly input into Google Workspace.

For Students and Parents

For pupils under the age of 13, we rely on parental consent for the processing of personal data through Google Workspace, including Google's limited processing of Service Data as a controller.

For pupils aged 13 and over, we have determined that Google's processing of Service Data as a controller is necessary for our legitimate interests in providing effective online education, and is proportionate given the limited purposes for which Google may use the data and the safeguards that are in place.

Data Retention - Student Records

How Long We Keep Student Information

We retain student data in accordance with education legislation, data protection law, and safeguarding requirements.

Key Retention Periods:

- **Student records and safeguarding files:** Until age 25 or 7 years after leaving (whichever is later)
- **Attendance records:** 3 years
- **Financial records:** 6 years
- **Digital learning materials:** Until completion of education plus 6 years

- **General communications:** 1-2 years

Legal Basis

These periods are required by education legislation, UK GDPR, and safeguarding guidance to support ongoing education, legal obligations, and child welfare.

Your Rights

Under the Data (Use and Access) Act 2025, you can request access to your child's records during these retention periods. We conduct reasonable and proportionate searches when responding to requests.

For full details, contact our Data Protection Officer at dataprotection@sophiahigh.school

The UK General Data Protection Regulation (UK GDPR) provides you with rights regarding your personal data, including the right to access, correct, delete, restrict processing of, and object to processing of your personal data.

These rights apply to Service Data processed by Google as a controller, and you can exercise these rights by contacting either:

- Sophia High School: Contact our Data Protection Officer, Mr Fernando Darcie at fernando.darcie@sophiahigh.school
- Google: Visit https://support.google.com/policies/contact/service_data_access

Further Information

For more detailed information about how Google processes Service Data as a controller, please refer to:

- The Google Cloud Privacy Notice:
<https://cloud.google.com/terms/cloud-privacy-notice>
- The Google Cloud Privacy Notice Supplement:
<https://cloud.google.com/terms/cloud-privacy-notice-supplement>

If you have any questions or concerns about this notice or Google's processing of Service Data, please contact our Data Protection Officer, Mr Fernando Darcie, at dataprotection@sophiahigh.school.

Cookies Policy

This site uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics.

Cookies generally exist to make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the help section of your browser.

What is a Cookie?

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive. To find out more about cookies, visit www.aboutcookies.org.

About Our Use of Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

When you visit our website, we may automatically collect the following information: technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.

Cookies We Use And Why

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Google Advertising cookies. [Google Analytics' Display Advertiser features](#) are enabled for the Google Analytics property this website is tagged with. This means that Google Analytics will drop additional cookies on your browser and collect data using [Google's advertising cookies](#) and identifiers, in addition to data collected through a standard Google Analytics implementation. For more information about Google's Advertising Cookies and how you can control advertising cookies visit [Google Advertising Privacy FAQ](#) and [Google's advertising cookies](#).

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.

Marketing cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising around the web more relevant to you. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them below:

The Sophia High School website uses cookies.

- We use cookies to personalise content and ads, to provide social media features and to analyse our traffic. Click on 'Show details' to understand more about individual cookies, listed on the left-hand side, and to manage your preferences.
- We share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.
- Cookies are small text files that can be used by websites to make a user's experience more efficient.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission. This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages.

Data Protection Complaints

If you have concerns about how we handle your personal data, we are here to help resolve them quickly and fairly.

Enhanced Complaints Process Under the Data (Use and Access) Act 2025, we provide accessible complaints procedures specifically for data protection matters. We will acknowledge your complaint within 30 days and respond without undue delay.

Submit a Complaint Use our [online complaints form](#) to raise any data protection concerns. The form is designed to capture the information we need to investigate your complaint thoroughly.

Your Rights You retain the right to contact the Information Commissioner's Office (ICO) at any time about data protection matters, whether or not you use our internal complaints procedure first.

Contact the ICO:

Website: ico.org.uk

Telephone: 0303 123 1113

Alternative Methods If you prefer not to use the online form, you may also submit data protection complaints by email to dataprotection@sophiahigh.school or by post to:

Sophia High School,
Office 315,
The Engine Room,
Battersea Power Station
London,
SW11 8DZ

General Privacy Policy

This privacy policy outlines how Sophia Technologies and Sophia High School handles your personal information.

Information We Collect

We collect information you provide directly to us, such as:

- Contact details (name, email address, phone number, address)
- Financial information (for purchases, account registration)
- Demographic data (age, gender, occupation, etc)

We also automatically collect certain information when you use our website or interact with us, including:

- Device information (IP address, browser type, operating system, etc.)
- Usage information (pages visited, searches, clicks, etc.)
- Access times and duration of visit
- Referring website address

How We Use Information

We use your information for purposes including:

- Providing and delivering requested products and services
- Managing accounts and processing payments
- Communicating about orders, products, services and promotions
- Analysing website traffic and customer demographics
- Developing new offerings and website functionality
- Marketing via email, text, ads and social media

Data Sharing and Disclosure

We do not sell personal information to third parties. We only disclose information to service providers, legal authorities or in other cases:

- With your consent or at your request
- To service providers under contract who help with our business operations
- As required by law, such as to comply with a subpoena or court order

- As needed in pursuing available legal remedies or defending legal claims

Data Security

We use appropriate technical and organisational measures to protect your information against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Data Retention

We retain personal information as needed to fulfil business purposes, comply with regulations, resolve disputes and enforce agreements. Retention periods vary based on the type of data and purpose for retention.

Your Data Rights

You have the right to request access to and receive information about the personal data we maintain about you. You also have the right to erasure, rectification, transfer and restriction of processing, as permitted by applicable laws.

Data Retention - Student Records

How Long We Keep Student Information

We retain student data in accordance with education legislation, data protection law, and safeguarding requirements.

Key Retention Periods:

- **Student records and safeguarding files:** Until age 25 or 7 years after leaving (whichever is later)
- **Attendance records:** 3 years
- **Financial records:** 6 years
- **Digital learning materials:** Until completion of education plus 6 years
- **General communications:** 1-2 years

Legal Basis

These periods are required by education legislation, UK GDPR, and safeguarding guidance to support ongoing education, legal obligations, and child welfare.

Your Rights

Under the Data (Use and Access) Act 2025, you can request access to your child's records during these retention periods. We conduct reasonable and proportionate searches when responding to requests.

For full details, contact our Data Protection Officer at dataprotection@sophiahigh.school

Google Workspace Service Data Processing

Introduction

This notice provides important additional information about how Google processes certain data related to your use of Google Workspace for Education services at Sophia High School. This information supplements our existing Privacy Notices and should be read alongside them.

What is Service Data?

In addition to the information you directly input into Google Workspace (known as "Customer Data"), Google also collects technical data about how you use their services. This technical information is called "Service Data" and includes:

- Information about your device (such as hardware model, operating system version, unique device identifiers, and mobile network information)
- Log information (such as details of how you used the service, IP address, and cookies)
- Location information (derived from various technologies including IP address)
- Usage statistics (such as how frequently you use particular features)
- Diagnostic data (information about service performance and error reports)

Google's Role as a Data Controller

Whilst Google processes most of your personal data on our behalf and under our instructions (as a "data processor"), Google also acts as a "data controller" for certain limited purposes with regard to Service Data. This means that Google may use Service Data for their own limited purposes, such as:

- Maintaining and improving Google Workspace services
- Developing new features and functionality
- Protecting against security threats, fraud, and abuse
- Complying with legal obligations
- Conducting analytics to understand service usage patterns

Google has committed to only process Service Data as a controller for the limited purposes set out in the Google Cloud Privacy Notice Supplement. They have further committed not to use Service Data for advertising purposes, user profiling, or to sell Service Data to third parties.

Our Commitment to You

Sophia High School takes your privacy seriously. We have entered into the Google Workspace for Education Service Data Addendum to ensure that appropriate safeguards are in place for the protection of all data processed through Google Workspace, including Service Data.

The protections of Google's Cloud Data Processing Addendum now extend to Service Data, providing contractual assurances similar to those that apply to the information you directly input into Google Workspace.

For Students and Parents

For pupils under the age of 13, we rely on parental consent for the processing of personal data through Google Workspace, including Google's limited processing of Service Data as a controller.

For pupils aged 13 and over, we have determined that Google's processing of Service Data as a controller is necessary for our legitimate interests in providing effective online education, and is proportionate given the limited purposes for which Google may use the data and the safeguards that are in place.

For Staff Members

Our lawful basis for permitting Google's processing of staff Service Data as a controller is our legitimate interest in providing effective cloud-based tools for educational and administrative purposes, balanced against the limited purposes for which Google may use the data and the safeguards that are in place.

Your Rights

The UK General Data Protection Regulation (UK GDPR) provides you with rights regarding your personal data, including the right to access, correct, delete, restrict processing of, and object to processing of your personal data.

These rights apply to Service Data processed by Google as a controller, and you can exercise these rights by contacting either:

- Sophia High School: Contact our Data Protection Officer, Mr Fernando Darcie at dataprotection@sophiahigh.school
- Google: Visit https://support.google.com/policies/contact/service_data_access

Further Information

For more detailed information about how Google processes Service Data as a controller, please refer to:

- The Google Cloud Privacy Notice:
<https://cloud.google.com/terms/cloud-privacy-notice>
- The Google Cloud Privacy Notice Supplement:
<https://cloud.google.com/terms/cloud-privacy-notice-supplement>

If you have any questions or concerns about this notice or Google's processing of Service Data, please contact our Data Protection Officer, Mr Fernando Darcie, at fernando.darcie@sophiahigh.school.

Data Protection Complaints

If you have concerns about how we handle your personal data, we are here to help resolve them quickly and fairly.

Enhanced Complaints Process Under the Data (Use and Access) Act 2025, we provide accessible complaints procedures specifically for data protection matters. We will acknowledge your complaint within 30 days and respond without undue delay.

Submit a Complaint Use our [online complaints form](#) to raise any data protection concerns. The form is designed to capture the information we need to investigate your complaint thoroughly.

Your Rights You retain the right to contact the Information Commissioner's Office (ICO) at any time about data protection matters, whether or not you use our internal complaints procedure first.

Contact the ICO:

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Sophia High School,
Office 315,
The Engine Room,
Battersea Power Station
London,
SW11 8DZ

Changes to the Privacy Notice / Policy

We reserve the right to amend this privacy notice / policy from time to time to reflect operational practices and legal requirements. We will post changes on our website and notify you of material changes as required by law. Your continued use of our website, products or services after any changes indicates your acceptance of the revised privacy policy.

We may update this notice from time to time. The current version will be posted on the school website.

Contact Information

Data Protection Officer: Fernando Darcie

dataprotection@sophiahigh.school