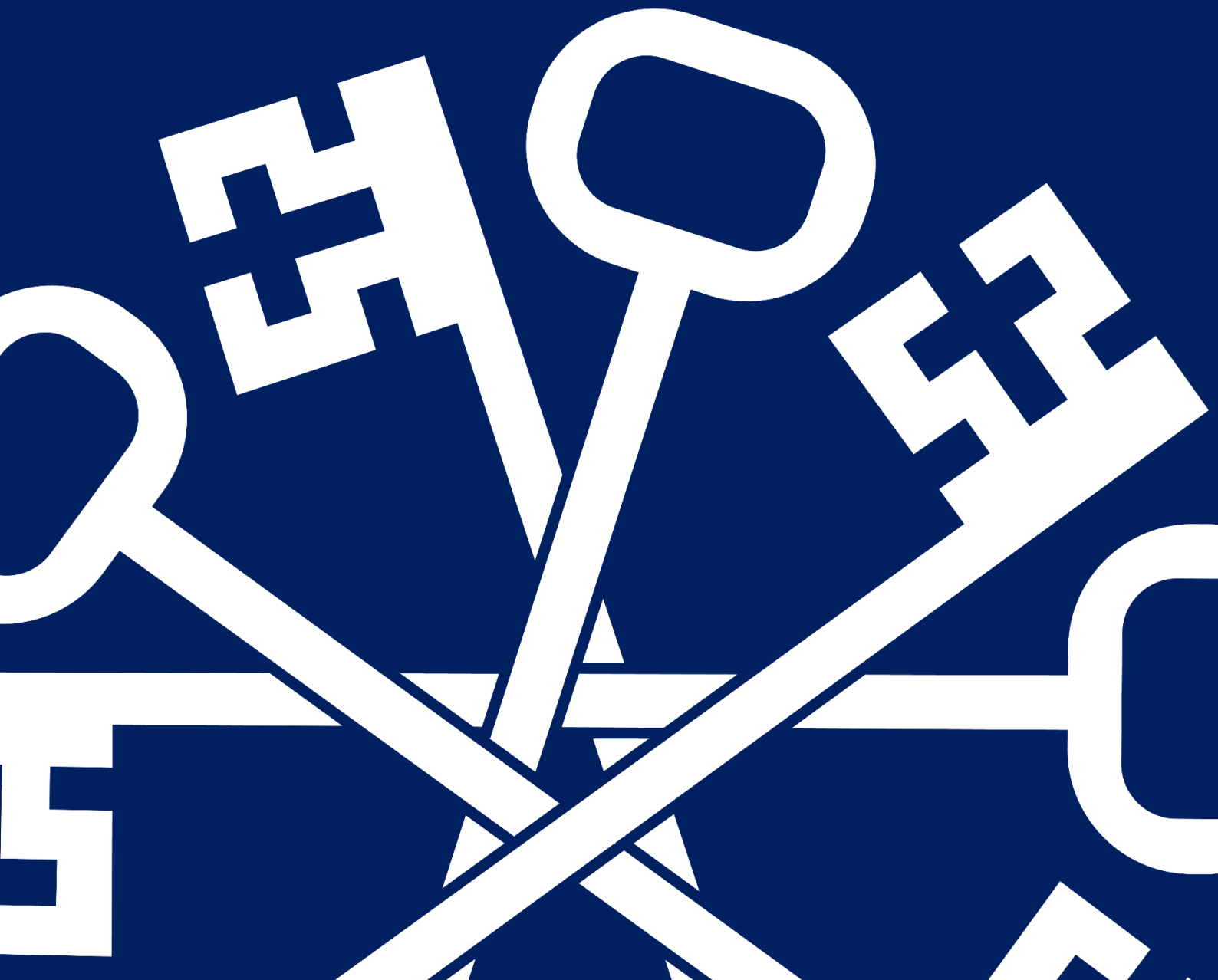




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Privacy Notice: Guest Wi-Fi Version 2.0



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1. Policy Statement

- 1.1. At the heart of our mission is the belief that every individual has untapped potential waiting to be unlocked. By fostering an environment that challenges and supports growth, we want to create pathways for social mobility. By providing the right tools, guidance, and opportunities, we enable each person to overcome barriers and reach their fullest potential.
- 1.2. We want our schools to not only places of learning but vibrant communities where every person feels they truly belong. Within this students, teachers, and support staff alike should feel they are developing and succeeding. This success should be an achievable reality for all, irrespective of background or circumstance. It may be quite different for each of us, but the key is the feeling of pride in doing well and enjoyment of the journey.
- 1.3. We are committed to building inclusive environments where the uniqueness of every individual is celebrated, and where collective growth is the norm.

2. Change Summary

- 2.1. Provided additional information regarding what information may be processed when accessing the Guest Wi-Fi.

3. Introduction

- 3.1. This Privacy Notice for Guest Wi-Fi Users explains how and why we store personal information about those who access our Guest Wi-Fi. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our school is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our ICO registration number is ZA347488.

4. The Categories of Guest Wi-Fi User Information That We Process

- 4.1. When you use our guest Wi-Fi service, we may process limited information relating to your use of the network, including:
 - a) Device IP addresses assigned while connected to the guest Wi-Fi network;
 - b) Basic connection and network activity logs, such as connection times and duration of use;
 - c) Browsing activity and websites accessed while connected to the guest Wi-Fi network.

- 4.2. We do not routinely monitor individual browsing activity. Access logs or browsing activity will only be reviewed where necessary to investigate suspected misuse of the network, including access to inappropriate, unlawful, or harmful material, or to protect the security and integrity of our systems and users.

5. Why We Collect and Use Guest Wi-Fi User Information

- 5.1. Under the UK General Data Protection Regulation (UK GDPR), the legal basis we rely on for processing personal information for these purposes are:
 - a) (6b) Performance of a Contract: the processing is necessary for the performance of a contract to which the data subject is party.
- 5.2. The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.

6. Storing Guest Wi-Fi User Information

- 6.1. We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our Data Protection Policy and our Records Management Policy on our website.

7. Who We share Guest Wi-Fi User Information With

- 7.1. We share Guest Wi-Fi User information with our guest Wi-Fi and network provider in order to perform the service of providing the guest Wi-Fi. We do not share Guest Wi-Fi User information with any other third parties unless we are legally required to do so.

8. Requesting Access to Your Personal Data

- 8.1. Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact gdpr@keystrust.org or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.
- 8.2. Depending on the lawful basis used for processing data (as identified above), you may also have the right to:
 - a) have your personal data rectified if it is inaccurate or incomplete;
 - b) request the deletion or removal of personal data where there is no compelling reason for its continued processing;
 - c) restrict our processing of your personal data (i.e. permitting its storage but no further processing);

- d) object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics; or
 - e) not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- 8.3. If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk. You can also contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

9. Contact

- 9.1. If you would like to discuss anything in this privacy notice, please contact: gdpr@keystrust.org or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.

10. Version History

VERSION	ACTION	RESPONSIBLE	DATE
1.0	Privacy notice updated with new DPO introduction	Jordan SMITHSON	29/06/2023
1.1	Review in line with policy schedule	DPO	01/06/2024
2.0	Clarity provided on the information that may be processed when accessing guest Wi-Fi onsite	Niamh WALSH	19/05/2026