

Privacy Notice for Primary Site

Juniper Education Group (“**Juniper**“) takes your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

This privacy policy aims to give you information on how Juniper collects and processes your personal data, including any data you may provide through this website, by telephone, by email or by post when you enquire or purchase a product or service or use our software. When we use your personal data we are regulated under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and Privacy and Electronic Communications (EC Directive) Regulations 2003. This privacy policy supplements other notices and privacy policies and is not intended to override them.

We are responsible as both a ‘controller’ and a ‘processor’ of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK legislation and our professional duty of confidentiality.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the [Glossary](#) to understand the meaning of some of the terms used in this privacy policy.

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1. IMPORTANT INFORMATION ABOUT WHO WE ARE

This privacy policy aims to give you information on how Juniper collects and processes your personal data, including any data you may provide through this website, by telephone, by email or by post when you enquire or purchase a product or service or use our software.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

The Client set out on the Order Form (collectively referred to as “you” or “your”) in this privacy policy) is the controller and is responsible for its personal data and Juniper Education Services Limited is the processor (collectively referred to as “Juniper”, “we”, “us” or “our” in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact Gayle Richardson, Data Protection Officer using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact Gayle Richardson, Data Protection Officer in the following ways:

Full name of legal entity: Juniper Education Services Limited

Email address: dpo@junipereducation.org

Postal address: [Boundary House, 4 County Place, Chelmsford, CM2 0RE](#)

Telephone number: [0345 200 8600](tel:03452008600)

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in February 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data may include first name, maiden name, last name, username or similar identifier, marital status, title, passport number, various student ID codes, Staff Code, date of birth and gender.
- Contact Data may include billing address, delivery address, email address and telephone numbers.
- Financial Data may include bank account and payment card details.
- Transaction Data may include details about payments to and from you and other details of products and services you have purchased from us, consents for trips and photos.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- Profile Data includes your username and password (e.g. for our EVOLVE Services), pupil type, registration groups, year groups, class names, pupil group names and IDs, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes pupil premium indicators, In LEA Care, information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- Special category personal data includes racial or ethnic origin, safeguarding concerns, data regarding children, special educational needs, eligibility for free school meals, FSM Ever 6, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic data, Biometric data (where used for identification purposes), data concerning health (including dietary needs and medical conditions), sex life or sexual orientation.

This personal data is required to enable us to provide the services you require to you. If you do not provide personal data we ask for, it may delay or prevent us from providing those services.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific service or website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms on our website or by corresponding with us by post, phone, email or face to face. This includes personal data you provide when you:
 - apply for our services;
 - create an account on our website;
 - subscribe to our services or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
 - analytics providers such as Google based outside the UK;
 - advertising networks based inside the UK; and
 - search information providers inside the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

- Identity and Contact and Transaction Data from local authorities, consultants and other professionals we may engage in relation to your matter, trade union, professional body or pension administrators.
- Identity and Contact Data from publicly available sources such as the Electoral Register based inside the UK.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data if we have a proper reason for doing so for example:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use personal data, so long as this is not overridden by your own rights and interests.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract (b) Used as a u (c) Prevents du
To process and deliver your service including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract (b) Necessary

Purpose/Activity	Type of data	Law
To provide the necessary deliverables for a Service to you.	(e) Marketing and Communications (a) Identity (b) Contact (c) Profile (d) Usage (e) Special Category Data	(a) Performance (b) Necessary (i) To identify (ii) Reporting (iii) for commu (iv) to help me (v) in relation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance (b) Necessary (c) Necessary customers use
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance (b) Necessary products/service
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary administration business reorg (b) Necessary
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for to develop the
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for services, to kee our marketing
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for business)

How and why we use special category personal data

Under data protection law, we can only use special category personal data where:

- we have a proper reason for doing so; AND
- one of the ‘grounds’ for using special category personal data applies.

There are ten potential grounds for using special category personal data under data protection law. Generally, where we use special category personal data, we will do so on the ground that this is necessary for providing services relating to children and establishing, exercising or defending claims. This includes using special category personal data, where necessary, for:

- software services that track pupil progress,
- actual or prospective court proceedings;
- obtaining legal advice; or
- establishing, exercising or defending legal rights in any other way.

Where this does not apply, we will seek explicit consent to process special category personal data.

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Internal Third Parties as set out in the Glossary below.
- External Third Parties as set out in the Glossary below.
- Specific third parties such as local authorities, the Department for Education and other similar relevant parties.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We, or our external third parties, may need to transfer your data outside the European Economic Area (United Kingdom UK).

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see “[*your legal rights*](#)” below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

9.1 You have the following rights, which you can exercise free of charge:

Access	Request access to your personal data (commonly known as a “data subject access request”) to see what information we hold about you and to check that we are lawfully processing it.
Withdraw consent	Withdraw consent at any time where we are relying on consent to process your personal data. You will not be able to process your personal data where we are relying on processing carried out before you withdraw your consent. If you withdraw your consent, we may need to request that you provide us with a different method of consent. We will advise you if this is the case at the time you withdraw your consent, where it is applicable.
Rectification	The right to require us to correct any mistakes in your personal data. This enables you to have any incorrect or incomplete information which we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
To be forgotten	The right to require us to delete your personal data—in certain situations. This does not apply to the extent that we are good reason for us continuing to process it. You also have the right to ask us to remove or suppress your personal data where you have exercised your right to object to processing (see below), where we may have a legal basis for doing so in order to comply with local law. Note, however, that we may not always be able to delete your personal data for technical or legal reasons. We will advise you if this is the case at the time of your request, where it is applicable.
Restriction of processing	Request restriction of processing of your personal data. This enables you to limit the way we process your personal data in the following scenarios: <ul style="list-style-type: none">• If you want us to establish the data’s accuracy.• Where our use of the data is unlawful but you do not want us to erase it.• Where you need us to hold the data even if we no longer require it as you have a legal claim against us.
Data portability	You have objected to our use of your data but we need to verify whether we have a legal basis to continue using your data. If we do, you will need to provide us with a copy of the data. You will also be able to request the transfer of your personal data to you or to a third party. We will provide you with your data in a structured, commonly used, machine-readable format. Note that this right only applies to the extent that the data was obtained from us directly or where we used the information to perform a contract with you.
To object	Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) which is overridden by your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. If you object, we will stop processing your personal data for the reasons you have provided. However, we may have compelling legitimate grounds to process your information which override your rights, and in this case you will need to provide us with evidence to prove this. You will not be able to object where we are processing your personal data for legal reasons (including where required by law to do so) or for our internal administrative purposes.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing which produces legal effects or similarly significantly affects you.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Juniper group of companies and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers including consultants, agents, lawyers, bankers, auditors and insurers based in the UK who provide consultancy for our services, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

11. COOKIE POLICY

What are cookies?

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. When you visit our website, we may collect information from you automatically through cookies or similar technology like 'pixels'. Pixels are small blocks of code installed on (or triggered) on a web page or advertisement which can retrieve certain information about your device and browser, as well as advertisement identifiers.

How do we use 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 also allows us to improve our site.
- tailor our content.
- remarket relevant information and resources to website visitors.

We use the following cookies:

- **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, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These 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. These cookies and pixels are used to deliver relevant ads, track email marketing or ad campaign performance and efficiency. This includes Google Analytics and Google Tag Manager.
- **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 (for example, your choice of language or region).
- **Targeting 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 displayed on it more relevant to your interests. This includes [Google Ads](#), [Facebook Ads](#), [Twitter Ads](#) and [LinkedIn Ads](#).