

CFBL - Privacy Notice
Applicable to all Members of the School Community (Past and Present)
including Pupils Aged 13-Year-Old and Over¹

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| Authorised by: | The Board of Governors of CFBL |
| Date: | WR 18.01.26 |
| Review frequency: | <u>Annually</u> or sooner following any updates to national and local guidance |
| Next review : | December 2027 |
| Circulation: | Governors/all staff/volunteers: automatically Staff: Shared drive > Policies + School website Prospective/current/former parents: upon request + School Website |

WHO WE ARE

CFBL is a limited company (Company n°02804123) and charity (Charity n°1027932). Our registered address is 87 Holmes Road, London NW5 3AX. We are accredited by the French Ministry for Education, and are a partnership school of the Agency for French Education Abroad (AEFE). We are also registered as an independent school with the Department for Education.

We are the data controller for your personal data under the UK General Data Protection Regulation, the Data Protection Act 2018, the Data Use and Access Act 2025 and supporting legislation (together, "**Data Protection Law**").

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School will collect, use or hold ("**process**") personal data about individuals including: its current, past and prospective pupils and pupils visiting from other schools ("**pupils**"); and their parents, carers or guardians ("**parents**"): including its current, past and prospective parents. Collectively, we refer to these individuals in this Privacy Notice as the School's "**community**".

This Privacy Notice also supplements our Staff & Governors Privacy Notice which applies to current and former staff, volunteers, contractors, governors/trustees and job applicants ("**staff**"). However, for staff the Staff & Governors Privacy Notice takes precedence.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form. It also applies in addition to any other relevant policies and any documents containing terms and conditions related to privacy, including without limitations:

- any contract between the School and its staff or parents;
- any policies or notices applicable to staff concerning the handling of personal data, including CFBL's Privacy Notice for Staff & Governors;

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Once pupils reach the age of 13, and in accordance with Data Protection Law, they are considered sufficiently mature to give their consent or make a request themselves (see section **Whose Rights?** below). For this purpose, the School will treat all 4eme and 3eme pupils as being over the age of 13.

- the School's policy on Taking, Storing and Using images of Children;
- the School's CCTV policy;
- the School's document retention policy;
- the School's safeguarding and health and safety policies, including as to how concerns or incidents are reported or recorded; and
- the School's IT policies, including its E-Safety policy and Use of Telephone Email Systems and Internet for Staff policy.

This Privacy Notice does not form part of any contract between you and the School and we may amend it at any time.

A separate privacy notice addressed to pupils under the age of 13 is annexed to this Privacy Notice. In the event of any conflict or inconsistency between this Privacy Notice and CFBL Privacy Notice for Pupils, this Privacy Notice will take precedence.

RESPONSIBILITY FOR DATA PROTECTION

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with CFBL's Data and Systems Manager (Valérie Baudin), in the first instance. The Data and Systems Manager can be contacted at dataprotection@cfbl.org.uk.

The School has also appointed a Data Protection Officer (the "DPO") who is responsible for overseeing compliance with this Privacy Notice and Data Protection Law. If you have any questions about how we handle your personal information which cannot be resolved by the Data & Systems Manager, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited
 Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
 Email: dataservices@judicium.com
 Web: www.judiciumeducation.co.uk
 Telephone: 0345 548 7000 (Option 1, then 1)

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents and complete its daily operations, the School needs to process a wide range of personal data. We will only use your personal data when we are allowed to under Data Protection Law. The most common reasons are detailed below. Some of these reasons may overlap and there may be several reasons why we use your personal data.

Some of this activity the School will need to carry out in order **to fulfil its legal rights, duties or obligations**. This includes processing data:

- For the purposes of pupil's admission (and to confirm the identity, nationality and source of funds of prospective pupils and their parents);
- For the purposes of complying with our legal obligations in respect of tax;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School.

Others will be necessary **to enter into or perform a contract** with its staff or parents, including:

- To provide education services whether on site or remotely (via Zoom, Google classroom or such other

tools/platforms as the School may decide), including extra-curricular activities to pupils, and monitoring pupils' progress and educational needs.

Other uses of personal data will be made in accordance with the School's **legitimate interests**, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals. The School expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- For the purposes of management planning and forecasting, research and statistical analysis;
- To enable relevant authorities (including British and French authorities) to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT policies;
- To make use of photographic images/voice recordings/videos of pupils for its internal use in accordance with the School's policy on Taking, Storing and Using images of Children;
- For security purposes, including CCTV in accordance with the School's CCTV policy;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the School's purposes, including without limitation to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process **special category personal data** (concerning health, race, ethnicity, sexual life or orientation, religion or philosophical beliefs, political opinions) or criminal records information (such as when carrying out DBS checks), in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, in the public interest, or from time to time by explicit consent where required. These reasons will include:

Substantial public interest/Health or social care:

- to safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- to safeguard pupil's welfare in the context of school exchanges (DBS and other criminal checks on hosting families);
- to provide educational services in the context of any special educational needs of a pupil;
- for legal and regulatory purposes (for example child protection and health and safety) and to comply with the School's legal obligations and duty of care (for example, to ensure students are taking their lunch and to manage food allergies and intolerances);
- as part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements;

Vital interest:

- to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, to caterers or organisers of school trips who need to be made aware of dietary or medical needs;

Legal claims:

- as part of any School or external complaints, disciplinary or investigation process that involves such data (for example if there are SEND, health or safeguarding elements), to establish, exercise or defend legal claims.

Public health:

- to take part to public vaccination programmes;
- to respond to epidemic or pandemic outbreaks.

We will only use your personal data for the reason we first collected it, unless we reasonably think we can use it for another, compatible purpose. If we use your personal information for another, unrelated purpose, we will notify you and explain the reason why.

CONSENT

We do not need your consent to use your personal data where we are otherwise permitted to process it under Data Protection Law. We also do not need your consent to process your special category data, as long as we meet one other additional condition under Data Protection Law.

Some data processing will be carried out by the School based on consent², for example **marketing and communication activities**.

In some other limited circumstances, we may approach you to ask for your specific and written consent to allow us to use certain types of data for another purpose. If this happens, we will provide you with full details of the information we want to use and the reason we need it, so you can carefully consider whether you wish to consent.

It is not a condition of any contract with us that you agree to any request for consent that might be made by us. Where you have given consent it can be withdrawn at any time, by contacting either the Marketing Admissions & Communications Manager at communication@cfbl.org.uk (in respect of marketing consent) or the Data and Systems Manager at dataprotection@cfbl.org.uk for withdrawal of any other consent.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

The categories of information we process will depend on whether you are a pupil or a parent, but will normally include the following:

- names, addresses, date of birth, telephone numbers, e-mail addresses and other contact details of pupils and their parents;
- nationality/right to stay in the UK, gender of pupils;
- emergency contacts;
- characteristics (such as language);
- attendance details (such as sessions attended, number of absences and reasons for absence);
- performance and assessment information;
- behavioural information (including exclusions);

² And, where a special category condition is required, explicit consent.

- previous/next schools attended by pupils and higher education provider attended by former pupils;
- parents' employers name;
- bank details and other financial information, e.g. about parents who pay fees to the School, and any anti money laundering/sanctions information we are required to collect by law;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health and welfare (including safeguarding information received from a previous school), and contact details for their next of kin;
- certain food choices, for the management of school lunches;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents past and present;
- images/voice recordings/videos of pupils (and occasionally other individuals) engaging in School activities (in accordance with the School's Policy on Taking, Storing and Using Images of Children) and images captured by the School's CCTV system (in accordance with the School's CCTV Policy);
- information about the use of our IT, communications and other systems, and other monitoring information;
- recordings of pupils and/or parents from the school's video conferencing platform.

We may also collect, store and use the following more sensitive types of personal information:

- information about your health, including any medical conditions (including allergies and food intolerance) and sickness records;
- special educational needs information,
- criminal records in the context of certain school exchanges.

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual) or collected from publicly available resources.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

Occasionally the School will need to share personal information relating to its community with third parties, such as:

- third party professional advisers where it is necessary for us to obtain advice or assistance (e.g. lawyers, insurers, PR advisers, accountants, IT support, information security);
- other third party professionals or service providers who carry out activities on our behalf (such as the school psychologist and speech therapist, the School's caterer, CFBL Clubs' providers, sports national leagues, debt collection agencies and companies providing background checks);

- government authorities or agencies (e.g. HMRC, DfE, police, the local authority, social care, CAHMS and the DBS));
- appropriate regulatory bodies such as EFE, MLF, AEFE, OFSTED, the Charity Commission, Companies House, the NHS and the Information Commissioner;
- management information systems used at CFBL (in particular EDUKA, WCBS, Factos, Pronote and Aymer) or such other third parties processing data on our behalf (for example Turboself);
- Providers of learning software;
- the MLF, EFE, AEFE and AEFE schools in England and appropriate French government authorities (e.g. the MEN inspectorate, the French Embassy Cultural Services or Security Services or the French Consulate social services);
- when a complaint is raised and in accordance with the School Complaints Policy;
- other schools abroad in the context of school exchanges; and
- schools in the UK or abroad to be attended by current or former pupils or formerly attended by current or former pupils.

Particularly strict rules of access apply in the context of:

- health/medical records;
- pastoral, learning support or safeguarding files;
- criminal record checks.

Medical data: The School needs to process such information to comply with statutory duties and to keep pupils and others safe, but the School will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for school trips or for catering purposes. Express consent will be sought where necessary and appropriate.

However, a certain amount of any pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Pastoral and learning support: The School uses Pronote, a secure software application which is used to record behavioural issues, sanctions and special educational needs.

Criminal record checks: The School occasionally uses Care Checks, a company providing background checks, to verify the criminal record of parents and other household members who are over 16 years old, when these individuals will host a student participating in a residential school trip with homestay provision. This is in compliance with regulatory requirements set out in the statutory guidance Keeping children safe in education.

Safeguarding data: Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes, concerns on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO, social services or police. For further information about this, please view the School's Child Protection Policy.

The School also uses CPOMS, a secure software application which is used to record safeguarding concerns.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems and platforms, payroll providers, video conferencing providers, management information systems, freelance contractors, cloud storage providers or criminal record checks providers. This is subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

TRANSFERS ABROAD

We may transfer your personal information to the following countries outside the UK:

- In the EEA, under adequacy regulation:
 - France
 - Republic of Ireland
 - Spain (for school trips)
 - Germany (for school trips)

We may also transfer personal data outside the UK on an ad hoc basis in order to undertake international trips or participate in international competitions. Details of the destination and appropriate safeguard will be provided separately in these circumstances.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

Please refer to our retention policy, available from our website. If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data and Systems Manager at dataprotection@cfbl.org.uk in the first instance. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or events of interest, including by sending updates and newsletters, by email and by post. The School will also use the contact details of (former) parents, alumni and other members of the School community to develop its own strategy.

Following an initial contact, any subsequent data processing for these purposes will be based on consent. Consent may be withdrawn at any time, by contacting the Marketing Admissions & Communications Manager at communication@cfbl.org.uk. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

AUTOMATED DECISION MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without any human intervention. We do not envisage that any decisions will be taken about you using automated means, but will notify you if this changes.

YOUR RIGHTS

Individuals have various rights under Data Protection Law. In certain circumstances, you have the right to:

- Request access to and receive a copy of your personal information (known as a data subject access request or DSAR).
- Request that we correct or complete any inaccurate or incomplete personal information that we hold about you.

- Request that we delete or remove personal information that we hold about you (known as the right to be forgotten).
- Request that we restrict our processing of your personal information, so we can store but not use it except in certain circumstances.
- Request that we transfer your personal information to another data controller.
- Object to us processing your personal information. This right is absolute if we are using your information for direct marketing.

Please note that the above rights are subject to certain exemptions. For guidance on your data rights, additional information is available on the Information Commissioner's Office (ICO) website: [For the public | ICO](#)

Any individual wishing to exercise their data rights should put their request in writing to the Data and Systems Manager (dataprotection@cfl.org.uk). The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month).

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. This means that the data of a pupil belongs to that pupil, and rights in respect of that data are the rights of the pupil. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form in respect of specific circumstances. Parents and pupils should be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent, either alongside or in place of parental consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

It is important to note that where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's E-Safety policy and the School Rules (*Règlements intérieurs*). Staff are under professional duties to do the same covered under the relevant staff policy.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Parents are requested to update their details directly on EDUKA.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

UPDATES

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues. You can also raise any concerns about how the School has handled your personal information with the Data and Systems Manager (dataprotection@cfbl.org.uk) or via the School complaints procedure.

Last review by management and data & systems trustees: January 2026

Document Owner and Approval

The Legal manager is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the School's policy review schedule.

Document trail

V0 - 17.05.18

V1 - 21.09.20

V2 - 15.11.22

V3 - 29.04.25

V4 - Current (with further edits of 21.01.26 by the Legal manager)

CFBL's Privacy Notice for Pupils Under 13

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| Authorised by: | The Board of Governors of CFBL |
| Date: | WR XX |
| Frequency of review : | <u>Every 2 years or sooner following any updates to laws and regulations</u> |
| Next scheduled review: | December 2027 |
| Circulation: | Governors/all staff/volunteers, automatically Staff: on shared drive >Staff > Policies + School website Parents/pupils > on request + School Website |

This privacy notice is a short and easily accessible privacy notice aimed at pupils of primary school age and secondary school pupils under the age of 13.

WHAT IS PERSONAL DATA?

Personal data is information about you. This is information that could potentially identify you. This includes for example your name, your date of birth, your address and phone number.



WHAT PERSONAL DATA DOES THE SCHOOL COLLECT?

Your information, including your name, address and date of birth, your gender, the language you speak at home, certain food choices;

Your school grades and records;

Safeguarding information;

Medical and special needs information;

Attendance records;

Photographs, videos, voice recordings and CCTV;

Information about your homelife.



WHY DOES THE SCHOOL NEED TO PROCESS YOUR INFORMATION?

We need this information to:

- know who is attending the school;
- provide you with education services,
- support your learning and enable you to take part in assessments;
- keep you safe and take appropriate action in the event of an emergency, incident or accident;
- give and receive information and references about you;
- carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- comply with the law;
- where otherwise reasonably necessary for our School's purposes, including to obtain professional advice and insurance for our School;
- maintain the relationship with our School community;
- assess the quality of our services and adjust them;
- communicate about CFBL and proceed with our marketing activities.

A lot of pupil data is used in order to comply with laws, for example about keeping a register of pupils. Other data is used for the purpose of allowing you to make the best of your time at School and CFBL will have what is called a "legitimate interest" for processing the information.

Finally, in some cases, CFBL uses the data only with your parents' agreement (called "consent"), for example when putting a photograph, a soundtrack, a piece of work or a video of you on the School's website. If you give your consent, you are always allowed to change your mind later. To withdraw your consent at CFBL, you have to email communication@cfbl.org.uk.

HOW CFBL COLLECTS DATA AND WHO HAS ACCESS TO IT

CFBL receives most of the data from you and your parents. In some cases, data comes from someone else such as another school.

Who does School Share Your Data With?

Your parents.

Professional advisers (for example the lawyers, insurers, accountants, school psychologist, speech therapist ...) or service providers (clubs providers, travel agencies, ...)

Regulatory and government bodies (such as the DfE, the police or the local authority, the MLF/AEFE, MEN, ...)

Support service providers (for example IT software providers/platforms, the School's caterer, ...)



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| Other schools and colleges you may wish to attend. | |
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| Sometimes data has to be sent abroad, for example for a school trip. | |
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Where does School Keep this Data?

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| We keep this data within the school, in a large manner of ways. This could be in files under lock and key or on a computer or IT platform with strong security. | |
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How long does the school keep this data for?

We often review our files to ensure we are only holding the documents we need. Once you leave the school, we may be required to keep some information about you.

YOUR RIGHTS

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| In certain circumstances: | |
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| <ul style="list-style-type: none">• request access to information about you held by the School• object to processing of your information• prevent processing for the purpose of direct marketing• have inaccurate information about you rectified, blocked, erased or destroyed. | |
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Any questions, please contact the School's Data and Systems Manager (dataprotection@cfbl.org.uk) or the school's data protection officer, Judicium Education (dataservices@judicium.com).

Document Owner and Approval

The Legal Manager is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the School's policy review schedule.

Audit trail

Initial version: current