The Goodwood Education Trust
(Registered charity number 1198212 as The West Sussex Countryside Studies Trust**)**

PRIVACY NOTICE

This notice describes the Goodwood Education Trust's privacy policy. Please read it in order to understand what we do with your information. The purpose of this privacy notice is to give you information on how we collect and process your personal data. It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Most of the people who take part in our activities and experiences are children under the age of 13 years old. This notice is written mainly for the schools, parents and guardians who book our activities and who give consent on a child's behalf.

Who we are

The Goodwood Education Trust is the working name for The West Sussex Countryside Education Trust (charity number 1198212). The Goodwood Education Trust is registered with the ICO under number ZB456320.

How to contact us

The Goodwood Education Trust, Home Farm, Goodwood, Chichester, West Sussex, PO18 0QF. Telephone number: 01243 755157. Email address: get@goodwood.com.

If you have any questions about this notice or about how we use personal data, please contact the Goodwood Education Trust Manager using the details above.

The data we collect about you

All personal information that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this privacy notice.

The type of data we collect about you:

- **Identity data** includes first name, last name and date of birth (including of a child attending our activities).
- **Contact data** includes address, email address and telephone numbers.
- **Emergency contact data** includes the names and contact details of a child's parents, guardians and emergency contacts.
- **Financial data** includes bank account and payment card details.
- **Special category data** includes information about a child's (or your if you are attending an activity) health, medical conditions and allergies, and dietary requirements.
- **Special categories of data** includes data about a child's (or your if you are attending an activity) health and dietary requirements.
- **Marketing and communications data** includes your preferences in receiving marketing from us and your communication preferences.

How your personal data is collected

The methods we use to collect data from and about you are detailed below:

Direct interactions:
You may give us your data by filling in forms, by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- book an activity or experience with us;
- attend one of our activities or experiences;
- request marketing to be sent to you;
- if you follow one of our social media accounts we receive basic information about you according to your profile. You may also communicate with us directly in this way.

We may also collect **your (or a child's) image or photograph** from when you have attended an event or taken part in an experience or activity. We only do this with consent, for a child, we obtain consent from a parent or guardian and you can ask us at any time to stop using an image.

We only collect and use **special category data**, such as a child's health, medical, allergy and dietary information, where it is necessary to provide our activities safely and to care for the children who attend. We obtain consent to do this. We will always treat special category data as confidential and will only share it internally where there is a specific and legitimate purpose for doing so. We have implemented appropriate physical, technical and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, or disclosure. We will only retain special category data for as long as necessary to fulfil the purposes we collected it for.

Children's personal data

Our activities and experiences are provided to children, so most of the personal data we hold is about children. We take particular care with children's data. Where we rely on consent we obtain consent or authorisation from the school or a person with parental responsibility.

How we use your personal data

We have set out below a description of all the ways we plan to use your personal data and which of the reasons we rely on to do so.

Purpose/activity	**Type of data**	**Lawful basis for processing including legitimate interest**
To process and manage your booking, to keep children safe and to provide for their health, allergy, dietary and care needs while they take part (including in an emergency) in an activity.	Identity Contact Emergency contact Financial Special category (health, medical, allergy, dietary)	Performance of a contract with you. Necessary to comply with a legal obligation. Protecting someone's vital interests (for example a medical emergency.) Necessary for our legitimate interests (to keep our records up to date and to improve our activities and services). Special category data: explicit consent; or, in a medical emergency, vital interests.
To make suggestions and recommendations to you about our activities and experiences that may be of interest to you.	Identity Contact Marketing and Communications	Necessary for our legitimate interests (to develop our activities and services and further our charitable purposes).
To send you marketing communications about our activities, events and fundraising that may be of interest to you.	Identity Contact Marketing preferences and communications	Consent; or, for electronic messages sent to further our charitable purposes, the charitable-purposes "soft opt-in", always with the option to opt out.

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to carry out our charitable activities and pursue our legitimate interests, for example to give you the best and most secure experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Vital interests:** We may use personal data where it is necessary to protect someone's life or health, for example to deal with a medical emergency during one of our activities.
- **Consent:** We rely on consent only where we have obtained your active agreement (or, for a child, the agreement of a parent or guardian) to use personal data for a specified purpose. You can withdraw consent at any time.
- **Conditions for special category data:** Where we use special category data (such as health, allergy or dietary information), we also rely on an additional condition for that data, normally explicit consent or the protection of vital interests in an emergency.

Marketing

Direct marketing

We will only send you marketing communications by email or text message where you have given us your consent, or where you have told us you are interested in our charitable work or have offered us your support and we are letting you know about ways to further our charitable purposes (the charitable "soft opt-in").

Every message will give you an easy way to opt out. We do not rely on legitimate interests alone to send you electronic marketing. We do not send marketing directly to children; we send marketing only to adults (such as parents, guardians or supporters) who have given the appropriate consent or soft opt-in.

Third-party marketing

We will always get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask us to stop sending you marketing communications at any time by contacting us at get@goodwood.com.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative purposes relating to your booking.

If you agree to us sending you marketing information or news you can always unsubscribe from mailings at a later date or narrow your preferences.

Cookies

Our website uses cookies. Cookies are small text files placed on your device that collect standard internet log information and information about how visitors use the site. Some cookies are strictly necessary to make the website work, and we set these automatically. For all other cookies, including analytics cookies that help us understand how the site is used and any marketing cookies, we will ask for your consent before they are set, through a cookie banner when you first visit the site, and you can change your preferences at any time. We do not rely on legitimate interests for non-essential cookies. For more information about the cookies we use and how to change your cookie preferences, please see www.goodwood.com/legal/cookies.

Disclosures of your personal data

We will only share your information in the circumstances below:

- Internal third parties. To manage your booking or for marketing purposes.
- Specific third parties. In limited circumstances we may disclose your personal information to third parties if we are under a legal obligation to do so or respond to valid legal processes, including Goodwood Education Trust's professional advisors, auditors and insurers or because it is necessary to share with a regulatory body.
- Emergencies. We may share information with medical professionals, the emergency services.

International transfers
We will not transfer your personal data to another country.

Data security

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

You have the right to ask us to provide you with all the information we store on you and to ask us to rectify, block, complete and delete your personal data, to restrict its use, and to port your data to another organisation. You also have the right to object to the processing of your data by us in some circumstances and, where we have asked for consent to process your data, to withdraw this consent.

There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information. In addition, we may retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

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 requirements.

As a general guide to how long we keep the main types of personal data:

Booking and contact records: for the duration of your relationship with us and then only as long as needed for our records.
Financial records: as required by law and by HMRC and Charity Commission guidance.

Health, allergy and dietary information: for as long as the child takes part in our activities, and then only as long as necessary.
Marketing preferences: until you ask us to stop or withdraw your consent.

Where records relate to an accident or injury, we may keep them for longer in line with recognised guidance.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Access – receive a copy of the personal data we hold about you and check we are processing it lawfully.
Correction – have inaccurate or incomplete data corrected.
Erasure – ask us to delete personal data where there is no good reason for us to keep processing it.
Objection – object to processing we carry out on the basis of our legitimate interests.
Restriction – ask us to suspend our use of your data in certain circumstances.
Portability – receive, or ask us to transfer, data you gave us by consent or under a contract, in a machine-readable format.
Withdraw consent – where we rely on consent, withdraw it at any time (this does not affect processing already carried out).

Some of these rights are qualified and will not always apply; where an exception means we cannot fully meet a request, we will explain why.

Where the information is about a child, a parent or guardian can usually exercise these rights on the child's behalf, and a child who is old enough to understand may exercise their own rights.

We will respond within one month.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). 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.

If you wish to exercise any of the rights above, please contact the Goodwood Education Trust Manager by email at get@goodwood.com.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). Our ICO number is ZB456320. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You also have the right to complain directly to us, and we have a procedure for handling complaints about how we use personal data; please use the contact details above.

If you are unhappy with the way we are handling personal data or you have any concerns about the protection of your personal data, you may raise a question or complaint with us. You can do this by emailing get@goodwood.com.

We will acknowledge receipt of your complaint within 30 days and we will, without undue delay, take appropriate steps to respond to your complaint, make appropriate enquiries, keep you informed and tell you the outcome of your complaint.