



**SIAL.school**  
Bilingual English/Italian

## **Privacy and GDPR Policy**

**Last reviewed May 2025**  
**Next review May 2026**

## Policy Statement

This policy explains when and why SIAL (“we”) collect personal information about our pupils, staff, supporters and suppliers, how we use it, how we keep it secure, and the rights of data subjects in relation to their data.

SIAL may, where appropriate, seek consent (opt-in) for certain types of communication, but also relies on other lawful bases for data processing, such as legal obligation, contract, and legitimate interests, in accordance with UK GDPR.

### 1. Introduction

- 1.1 This policy sets out the basis on which personal data collected by SIAL, or provided to SIAL by users of its services, will be processed. It outlines SIAL’s practices regarding personal data handling and storage. For the purposes of UK GDPR, SIAL is the data controller.
- 1.2 The SIAL website is operated by SIAL. SIAL is registered in England and Wales under company number 604604 and charity number 1119966. Registered office: 156 Holland Park Avenue, London W11 4UH.
- 1.3 Definitions: “data processor”, “data subject” and “data controller” are as defined under UK GDPR. The term “user” refers to anyone using SIAL’s services, including online services. “Community member” includes students, staff, parents, alumni, and members of the governing board.
- 1.4 SIAL is registered with the Information Commissioner’s Office (ICO) under registration number Z1968421. SIAL commits to processing personal data in accordance with UK GDPR principles:
  - Lawfully, fairly, and transparently.
  - For specified, explicit and legitimate purposes.
  - Adequate, relevant and limited to what is necessary.
  - Accurate and, where necessary, kept up to date.
  - Retained only as long as necessary.
  - Securely processed and protected against unauthorised access or loss.
- 1.5 SIAL adheres to the principle of data protection by design and by default. This includes reviewing the effectiveness of data protection policies, staff training, and privacy considerations in the design of systems and processes.

### 2. Data Collection

- 2.1 SIAL may collect:
  - Information from forms submitted on its website.
  - Correspondence records.
  - Survey responses.
- 2.2 SIAL uses cookies and similar technologies to understand website usage. In line with the Privacy and Electronic Communications Regulations (PECR), users are informed about cookie use, provided with clear information, and asked for consent.
- 2.3 Non-personal statistical data may be collected, such as IP addresses and browser types, for administrative purposes.

### 3. Data Storage

- 3.1 By submitting personal data, users agree to its storage and processing as described. SIAL takes reasonable steps to protect personal data.
- 3.2 Despite best efforts, data transmission via the internet is not completely secure. Users share data at their own risk.

### 4. Use of Information

- 4.1 SIAL processes data for:
  - Educational and safeguarding obligations.
  - Providing requested information or services.
  - Participation in SIAL’s online features.
  - Service updates.
  - Website personalisation.
- 4.2 Data is used solely for its intended purpose unless additional consent is obtained.
- 4.3 Consent is only valid when freely given, specific, informed, and unambiguous.
- 4.4 Where processing is based on consent:
  - It must be active and separate from other agreements.
  - Consent withdrawal must be easy and not affect prior lawful processing.
  - Different processing activities require separate consent.

4.5 SIAL ensures consent requests are understandable and, where relevant, provided in Italian.

4.6 SIAL recognises that consent is not always the most appropriate legal basis. Legitimate interests or legal obligations may be more appropriate in certain contexts.

4.7 SIAL relies on legitimate interest or legal obligation for some data processing, such as payroll and safeguarding checks. Legitimate interest assessments are documented.

4.8 As a *scuola parificata*, SIAL shares relevant personal data with regulatory and educational authorities when required, and with third parties where necessary.

## **5. Data Subjects' Rights under UK GDPR**

5.1 Data subjects have rights to:

- Access their data
- Be informed about processing
- Rectify inaccuracies
- Erase data in certain cases
- Restrict or object to processing
- Data portability

5.2 Complaints can be made to the ICO: <https://ico.org.uk/concerns/> 0303 123 1113 ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

5.3 Data access requests will be fulfilled within one month. Requests may be refused if manifestly unfounded or excessive, with justification provided. Disclosure may be restricted to protect the rights of others.

5.4 SIAL will erase personal data if it is no longer needed, or if consent is withdrawn, in line with Article 17 of UK GDPR.

5.5 SIAL minimises access to personal data, restricting it to staff who need it. Data protection is embedded into system design in accordance with Article 25.

5.6 Data breaches likely to result in risks to individual rights will be reported to the ICO within 72 hours, and data subjects will be informed when appropriate.

## **6. Data Retention**

6.1 Data will be retained only as long as necessary and reviewed annually. Archived data may be kept for compliance purposes.

6.2 Financial data is securely destroyed when no longer needed.

## **7. Automated Decision-Making and Profiling**

7.1 SIAL respects the right not to be subject to solely automated decisions with significant effects.

7.2 Automated processing will occur only where: • Necessary for a contract • Legally authorised • Based on explicit consent

7.3 Where automated decisions are made, SIAL ensures data subjects can request human review.

7.4 Special category data is processed in compliance with Article 9.

## **8. Data Analysis**

8.1 SIAL may analyse publicly available data to better understand the school community. All such processing is subject to data protection safeguards.

## **9. Intellectual Property**

9.1 All intellectual property on the website is owned or licensed by SIAL.

9.2 Users must not reproduce or modify content without permission.

9.3 Commercial use of content is prohibited without a licence. Infringement may result in termination of website use rights.

9.4 Website terms may be revised, and users are expected to comply with updates.

## **10. Website Security**

10.1 Users must not introduce malicious software.

10.2 Unauthorised access is prohibited.

10.3 Attacks on the website will be reported to authorities and may result in prosecution.

10.4 Breach of these terms results in termination of access.

10.5 SIAL is not liable for damage caused by malicious attacks or viruses.

## **11. External Links**

11.1 SIAL is not responsible for content on third-party websites linked from its own.

## **12. Data Protection Officer**

12.1 SIAL has appointed a Data Protection Officer (DPO) responsible for compliance and internal record keeping. Contact details are provided to the ICO and relevant authorities. To contact the DPO: [dpo@scuolaitalianalondra.org](mailto:dpo@scuolaitalianalondra.org)