



WHEEL OF INDEPENDENCE™ Privacy Policy

Overview – the key information you should be aware of

(A) **Who we are:** We are Moor House School & College, a specialist school for children and young people with language disorders, and supplier of the WHEEL OF INDEPENDENCE™ online tool. If you need it, our charity number is 311871 and our registered address is Moor House School & College, Mill Lane, Hurst Green, Oxted, Surrey, RH8 9AQ. Moor House School & College is the controller of your personal information, and is responsible for your personal information. All references in this policy to "Moor House", "our", "us" or "we" refer to Moor House School & College, All references in this policy to "our website", refer to the website owned by Moor House at <https://www.wheelofindependence.co.uk/>.

(B) **Our values and what this policy is for:** We value your privacy and want to be *accountable* and *fair* to you as well as *transparent* with you in the way that we collect and use your personal information. We also want you to know *your rights* in relation to your information which you can find in section 6, below.

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please let us know using our contact details in section 11.

(C) **Who this policy applies to:** This policy applies to:

1. Customers, and their administrators, of the WHEEL OF INDEPENDENCE™ online tool (the "WOI"); and
2. Individuals and potential customers who contact us with enquiries.

Depending on our relationship, we will collect and use your information in different ways.

What this policy contains: This privacy policy describes the following important topics relating to your information:

1. How we obtain your personal information (see section 1);
2. Collection of your personal information and how we use it (see section 2);
3. Our legal basis for using your personal information (see section 3);
4. How and why we transfer your personal data to third parties (see section 4);
5. How long we store your personal information (see section 5);
6. Your rights (see section 6);
7. Where we may transfer your personal information (see section 8);
8. Risks and how we keep your personal information secure (see section 9);
9. Changes to this privacy policy (see section 10); and
10. Further questions and how to make a complaint (see section 11).



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- (E) **Your rights to object:** You have various rights in respect of our use of your personal information as set out in section 6. One of the fundamental rights to be aware of is that you may ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

You can find out more information in section 6.

- (F) **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

The detail – the key information you should be aware of

1. How we obtain your personal information

- 1.2 You may provide us with your personal information voluntarily. We may also receive information about you from third parties such as our customers.
- 1.3 You may give us personal information about yourself by setting up an account on the WOI, using bulletin boards or forums on our website, or by contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive products, deliveries, information or services from us.

2. Collection of your personal information and how we use it

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

2.1 Visitors to our website

- (a) What personal information we collect about you

We, will/may collect and use any of the following information about you:

- (i) information provided when you correspond with us;
- (ii) any updates to information provided to us;
- (iii) the following information created and recorded automatically when you visit our website:
 - (A) **Technical information.** This includes: the Internet Protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our webpages;
 - (B) **Information about your visit and your behaviour on our website** (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction



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information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads; and

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to allow you to access our website;
- (ii) to receive enquiries from you via email;
- (iii) for improvement and maintenance of our website and to provide technical support for our website;
- (iv) to ensure the security of our website;
- (v) to recognise you when you return to our website, to store information about your preferences, and to allow us to customise the website according to your individual interests; and
- (vi) to evaluate your visit to the website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

Please see sections 2.4 and 2.5 for more details about how we use your personal information.

(c) A word about cookies

- (i) Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- (ii) Where we use cookies, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.
- (iii) For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies policy here <https://www.wheelofindependence.co.uk/content/pdfs/woi-cookie-policy.pdf>.

2.2 Customers, and their authorised users of our services

(a) What personal information we collect about you

We may collect and use any of the following information about you:

- (i) your name;



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- (ii) your email address;
- (iii) your IP address
- (iv) your telephone number;
- (v) information provided when you correspond with us;
- (vi) any updates to information provided to us; and
- (vii) information you provide to help us provide you with improved service, for example if we ask you to fill in a survey or questionnaire.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to facilitate delivery of services to you;
- (ii) to deal with any enquiries or issues you have about the WOI and/or the services that you request from us; and
- (iii) to send you certain communications (including by email or post) about our products and services such as administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges).

Please see sections 2.4 and 2.5 for more details about how we use your personal information.

(c) We will not collect any special categories of data about you.

(d) Information we need to provide services to you. We need certain types of personal information so that we can provide services to you and perform contractual and other legal obligations that we have to you. If you do not provide us with such personal information, or if you ask us to delete it, you may no longer be able to access the WOI.

2.3 People who contact us with enquiries

(a) We may collect and use any of the following information about you:

- (i) your name including your title;
- (ii) your postal address;
- (iii) your email address;
- (iv) your telephone number;
- (v) information provided when you correspond with us;
- (vi) any updates to information provided to us; and
- (i) your IP address.

(b) How we use your personal information



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We will collect, use and store the personal information listed above to deal with any enquiries or issues you have about our products and services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes.

Please see sections 2.4 and 2.5 for more details about how we use your personal information.

2.4 Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

- (a) to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- (b) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- (c) to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so;
- (d) to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so; and

2.5 Further processing

Before using your personal information for any purposes which fall outside those set out in this section 2, we will undertake an analysis to establish if our new use of your personal information is compatible with the purposes set out in this section 2.

3. Legal basis for use of your personal information

3.1 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

- (a) our use of your personal information is necessary to perform our obligations under any contract with you (for example, to comply with the terms of use of our website which you accept by browsing our website and/or to comply with our contract to provide services to your school); or
- (b) where (a) does not apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are to:
 - (i) run, grow and develop our tools and/or services; and
 - (ii) operate the WOI online tool.



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If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a *balancing test* to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section 12.

- 3.2 We may use your special categories of data (such as health and wellbeing information) where you have provided your consent (which you may withdraw at any time after giving it, as described below).
- 3.3 We may process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).
- 3.4 If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at woiinfo@moorhouseschool.co.uk and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide the WOI and associated services to you.

4. How and why we share your personal information with others

- 4.1 We will share your personal information with the following third parties or categories of third parties:
 - (a) Software developers, who provide support and maintenance for the WOI and may access personal data stored within that solution when providing support and maintenance purposes;
 - (b) we may share anonymised and aggregated statistical information with our suppliers to demonstrate what interest there has been in any marketing campaigns we have assisted our suppliers in carrying out;
- 4.2 Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.
- 4.3 We may disclose your personal information to third parties.
 - (a) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
 - (b) in order to enforce or apply our terms of use, our terms and conditions for customers or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
 - (c) to protect the rights, property, or safety of Moor House School & College, our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection.
- 4.4 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.



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4.5 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

5. How long we store your personal information

5.1 We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

5.2 We will retain personal data collected via the WOI for 2 months following termination of the contract under which such data is provided to us. This is to allow customers to discontinue access and paying fees for the services, whilst ensuring that data in respect of their students is not deleted until such students will foreseeably have left the customer's school. Once this 2 month period has expired, we will promptly delete any personal data provided by that customer.

6. Your rights

6.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at woiinfo@moorhouseschool.co.uk at any time. You have the following rights:

(a) **Right of access.** You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation as to whether your personal information is being used by us; details about how and why it is being used.

(b) **Right to update your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.

(c) **Right to delete your information.** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 11.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, using the contact details in section 11.

(d) **Right to restrict use of your information:** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 11.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details in section 11.

(e) **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

(f) **Right to data portability:** You have a right to ask us to provide your personal information to a third party provider of services.



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This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.

- (g) **Right to object.** You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

6.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

6.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

7. Marketing

7.1 We may collect and use your personal information for the purpose of sending you an newsletter by email and post.

7.2 We may send you certain marketing communications (including electronic marketing communications) if it is in our legitimate interests to do so for marketing and business development purposes or, if you are a sole trader or a non-limited liability partnership if you have consented to receive such electronic marketing information.

7.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

7.4 If you wish to stop receiving marketing communications, you can contact us by email at woiinfo@moorhouseschool.co.uk.

8. Where we may transfer your personal information

8.1 Further details on the steps we take to protect your personal information is available from us on request by contacting us by email at woiinfo@moorhouseschool.co.uk at any time.

9. Risks and how we keep your personal information secure

9.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public, information that you would prefer to keep private.

9.2 For this reason, Moor House School & College is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures. Further, the server is locked in a secure room, in the main school building which has an access control system. Online access to the tool is via a password with two factor authentication and different levels of access. The server is protected by a firewall and anti-virus software, and data is backed up every day with backups kept for 2 weeks. We use SSL encryption for the website.



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- 9.3 In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.
- 9.4 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 10. Changes to our privacy policy**
- We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.
- 11. Further questions and how to make a complaint**
- 11.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact woiinfo@moorhouseschool.co.uk. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.
- 11.2 In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of 21 March 2024.