

WEBSITE PRIVACY NOTICE

2026/27

Rochester Independent College is part of the Dukes Education Group.

Rochester Independent College respects your privacy and is committed to protecting your personal data. This privacy notice explains how we collect and use personal data when you visit or interact with our website, and tells you about your privacy rights and how the law protects you.

In this notice, "Data Protection Legislation" means the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 ("DPA 2018"), the Data (Use and Access) Act 2025 ("DUAA") and, where applicable, the Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR").

Summary of how we use your personal data

Rochester Independent College uses your personal data:

- where we need to perform a contract which we are about to enter into, or have entered into, with you;
- where it is necessary for our legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal obligation;
- where it is necessary to protect someone's vital interests;
- where a task in the public interest is applicable; or
- where we have your consent.

Personal data may be shared with relevant companies within the Dukes Education Group and, where necessary and lawful, with third parties such as:

- companies that assist us in providing our website, education, admissions and other services;
- payment, professional-advisory and insurance providers;
- regulators, public authorities and safeguarding bodies; and
- organisations carrying out checks where relevant to recruitment, safeguarding or another legitimate College purpose.
- Where we rely on your consent, including for some marketing and non-essential cookies, you can withdraw that consent at any time. You also have an absolute right to object to direct marketing.



Further detail about our processing and your data-protection rights is set out below.

What does this notice cover?

This notice describes how Rochester Independent College uses personal data collected when you visit or interact with our website, submit an enquiry, register your details or your child's details, request information, apply for a place, book or purchase a resource or service, or otherwise communicate with us online.

Rochester Independent College Ltd (company number 08504140), trading as Rochester Independent College, will normally be the controller of personal data collected through this website. The College's registered office is Dukes House, 58 Buckingham Gate, London, SW1E 6AJ.

The College is part of the Dukes Education Group. Where appropriate and lawful, personal data may be shared with relevant companies within the Group. A Group company that determines its own purposes and means of processing will be a separate controller of the information it receives. In limited circumstances, the College may act jointly with another controller or process information on behalf of another controller.

This notice also describes your data-protection rights, including your right to object to certain processing. More information about your rights and how to exercise them is set out in the section "What rights do I have?".

What information do we collect?

We collect and process personal data about you when you interact with us and our website, make an enquiry or application, or purchase resources or services from us. Depending on the nature of your interaction, this may include:

- your name, your child's name, account username and password;
- your or your child's sex or gender, where relevant;
- your or your child's age and date of birth;
- health, medical, disability, allergy, special educational needs or safeguarding information where necessary;
- your home address, email address and telephone number;
- admissions, educational and course-interest information provided through an enquiry or application;
- payment and billing details where you make a payment or purchase, although full payment-card details may be collected directly by our payment provider rather than by the College;
- your marketing and cookie preferences, including any consents you have given us;
- communications and documents you send to us;



- information about how you use our website; and
- technical information about the browser or device used to access the website, including IP address, device identifiers and cookie or similar-technology data.

We normally obtain this information directly from you or from a parent or guardian. We may also receive information from another Dukes Education Group company, a previous school, a professional adviser, a payment provider, a referral source, publicly available sources or another third party where this is lawful and relevant.

Some information, including health information, may be special-category personal data. We process this only where we have both an appropriate lawful basis under Article 6 UK GDPR and an additional condition under Article 9 UK GDPR and the DPA 2018. Depending on the circumstances, this may include safeguarding and substantial-public-interest conditions, health or social-care purposes, the protection of vital interests, legal claims or explicit consent.

How do we use this information, and what is the legal basis for this use?

We process personal data for the following purposes:

To fulfil a contract or take steps linked to a contract, particularly where you request, apply for or purchase resources or services from us. This may include:

- verifying identity and administering accounts;
- processing payments;
- communicating with you; and
- providing customer, admissions and related services and arranging delivery or provision of resources or services.
- As required to conduct our business and pursue our legitimate interests, in particular:
- providing information about courses, resources and services you have requested or enquired about and responding to comments or complaints;
- monitoring, improving, personalising and protecting our website, resources and services;
- understanding how people use the website and measuring the effectiveness of our communications;
- preventing, detecting, investigating and reporting fraud, misrepresentation, security incidents or crime;
- investigating complaints and establishing, exercising or defending legal claims;
- meeting compliance, regulatory, safeguarding and investigative needs, including lawful disclosures to the Department for Education, the Independent Schools Inspectorate, the police or other relevant authorities;
- inviting appropriate individuals to take part in market research; and
- managing, developing and protecting the College and the Dukes Education Group.



Where you give us consent:

- sending direct electronic marketing where consent is required;
- placing non-essential cookies or using similar technologies where consent is required; and
- using personal data for another purpose explained when we ask for your consent.
- For purposes required or permitted by law, including:
 - complying with education, safeguarding, equality, health and safety, financial, regulatory and other legal obligations;
 - responding to lawful requests from government, regulators, courts or law-enforcement authorities; and
 - obtaining parental authorisation where this is required for an online service offered directly to a child under 13.
- Where necessary to protect the vital interests of an individual, such as in a medical emergency.

As an education provider, we recognise that our website and online enquiry, admissions and communication services may be used by children and young people as well as parents and guardians. When processing children's personal data, we take account of their age, understanding, best interests and the particular need to protect their rights and freedoms.

Relying on our legitimate interests

Where we rely on legitimate interests, we consider the purpose of the processing, whether it is necessary and the impact on the individuals concerned. We will not rely on legitimate interests where those interests are overridden by an individual's interests, rights or freedoms. We document balancing assessments where appropriate. You may request further information by contacting us using the details at the end of this notice.

Withdrawing consent or otherwise objecting to direct marketing

Where we rely on consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn, and we may have another lawful basis to retain or use some information for a different purpose.

We may use your contact details to provide information about relevant College courses, events and services. We will identify an appropriate data-protection lawful basis and comply with PECR where marketing is sent electronically. Where consent is required, we will obtain it before sending marketing. Where the law permits another exception, such as the existing-customer "soft opt-in", we will meet the applicable conditions.



You have an absolute right to object to direct marketing at any time. You can unsubscribe using the link in an electronic message, update your account preferences where available, or contact us using the details below.

Who will we share this personal data with, where and when?

Where necessary and lawful, we may share personal data with relevant companies within the Dukes Education Group for purposes including administration, safeguarding, reporting, quality assurance, service improvement and referrals to another service requested by you, such as university consultancy.

We may also share personal data with:

- website-hosting, maintenance, cloud, IT, communications, analytics and identity-checking providers;
- payment providers, insurers, auditors, lawyers and other professional advisers;
- education, admissions, examination and assessment organisations;
- health, welfare and safeguarding professionals and organisations;
- government departments, regulators, inspection bodies, courts and law-enforcement authorities where required or permitted by law;
- organisations conducting appropriate checks in connection with recruitment, safeguarding or fraud prevention; and
- other organisations where you request the disclosure, validly consent to it, or the disclosure is otherwise necessary and lawful.
- Service providers acting as processors may use personal data only on our documented instructions and must protect it under appropriate contractual and security arrangements.

If the College or relevant part of its business is reorganised, transferred, sold or integrated with another organisation, information may be disclosed to professional advisers, potential purchasers or new owners where necessary and subject to appropriate safeguards.

International transfers

Some service providers may store personal data outside the United Kingdom or permit it to be accessed from another country. Where this involves a restricted transfer, we will ensure that the requirements of Data Protection Legislation are met. Safeguards may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved contractual clauses or another legally recognised safeguard. Where required, we will undertake an appropriate transfer-risk assessment. Further information about the safeguards used is available from the Data Champion.



How do we keep personal data secure?

We use appropriate technical and organisational measures designed to protect personal data against unauthorised or unlawful use, accidental loss, destruction or damage. Access is limited to people who have a legitimate need to use the information, and relevant service providers are required to apply appropriate confidentiality and security safeguards. No online transmission or storage system can be guaranteed to be completely secure.

Cookies and how we use them

Cookies and similar technologies are small files or items of information stored on, or accessed from, your browser or device. They can make a website work, remember choices, support security, measure use and help improve content and services.

We use strictly necessary technologies where required to operate and secure the website. We may also use functional, analytics or advertising technologies. Where consent is required under PECR, these technologies will not be used until you have made a choice through our cookie-preference tool. Where Data Protection Legislation permits a technology to be used without consent, we will provide the information and choices required by law.

The cookie notice and preference tool on our website provide current information about the cookies and similar technologies in use, their providers, purposes and duration. You can review or change your choices at any time using the cookie-preference tool. You can also manage cookies through your browser settings, although blocking some technologies may affect website functionality.

What rights do I have?

Your rights in connection with personal information

Depending on the circumstances, you may have the right to:

- request access to your personal data and supplementary information about our processing;
- request correction of inaccurate or incomplete personal data;
- request erasure of your personal data in certain circumstances;
- object to processing based on legitimate interests because of your particular situation;
- object at any time to processing for direct-marketing purposes;
- request restriction of processing in certain circumstances;
- receive personal data you have provided to us in a structured, commonly used and machine-readable format and, where applicable, have it transmitted to another controller;
- withdraw consent at any time where processing is based on consent; and



- rights and safeguards relating to solely automated decisions that produce legal or similarly significant effects.

The College does not currently use personal data collected through the website to make solely automated decisions that produce legal or similarly significant effects. If this changes, we will provide the information and safeguards required by law.

Not all rights apply in every circumstance, and statutory exemptions may apply. For example, a request may be limited where disclosure would reveal another person's personal data, infringe another person's rights, or concern information that we are required by law to retain. We will explain any exemption relied upon when responding to a request.

Data-protection rights belong to the individual concerned. A parent or guardian does not automatically exercise a child's rights. Where a request concerns a child, we will consider the child's age, maturity, understanding, best interests, safeguarding needs and whether another person has appropriate authority to act on their behalf.

To exercise a right, contact the Data Champion using the details below. We may request information reasonably necessary to verify identity. We will respond without undue delay and normally within one month, subject to any lawful clarification, extension or exemption.

Data-protection complaints

If you are dissatisfied with how we have used your personal data, you may make a data-protection complaint to the Data Champion using the details below. We will acknowledge receipt within 30 days, take appropriate steps to investigate the complaint without undue delay, keep you appropriately informed and communicate the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection. We would welcome the opportunity to consider your concerns first, but this does not affect your right to contact the ICO. Further information is available at www.ico.org.uk.

How long will you retain my personal data?

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, including to meet legal, regulatory, safeguarding, accounting, reporting and legitimate operational requirements. Retention periods vary according to the type of information, the relationship concerned, relevant limitation periods and applicable guidance or legal requirements.



When personal data is no longer required, it will be securely deleted, destroyed or anonymised. Further information about relevant retention arrangements is available from the Data Champion at gdpr@rochester-college.org.uk

Which entity is my data controller, and which affiliates might my personal data be shared with?

For information collected through the Rochester Independent College website, the controller will normally be Rochester Independent College Ltd (company number 08504140), trading as Rochester Independent College.

The College may share personal data with relevant companies within the Dukes Education Group where this is necessary and lawful. Any Group company that determines its own purposes and means of processing will be a separate controller. You may contact the Data Champion if you would like further information about the identity of a Group company with which your personal data has been shared.

How do I get in touch with you?

We hope that we can resolve any question or concern you may have about how we process personal data. To exercise your rights, make a data-protection complaint, object to direct marketing or request further information, contact the Data Champion:

Rochester Independent College

254 St Margaret's Banks

Rochester

Kent

ME1 1HY

Telephone: +44 (0)1634 828155

Email: gdpr@rochester-college.org.uk

Information Commissioner's Office: www.ico.org.uk

Last reviewed: August 2026

Next review: August 2027, or earlier if the College's processing, website technologies or applicable law changes.